COMPLIANCE EVALUATION AND SAMPLING INSPECTION
AT
SBA SHIPYARDS, INC.
JENNINGS, LOUISIANA
LAD008434185

SUMMARY REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Solid Waste
Washington, DC 20460

Work Assignment No.	:	R06024
EPA Region	:	6
Date Prepared	:	October 26, 1994
Contract No.	:	68-W4-0007
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

November 4, 1994

ORIGINAL DOCUMENT
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Dept. of Environmental Quality
Hazardous Waste Division
Enforcement

Mr. Glenn Miller
Assistant Secretary
Louisiana Department of
Environmental Quality
Office of Solid and Hazardous
Waste
P.O. Box 82282
Baton Rouge, LA 70884-2282

RE: Inspection Report for SBA Shipyards Jennings, Louisiana
EPA I.D. No. LAD008434185 LAD 008434185

Dear Mr. Miller:

As prescribed by the Memorandum of Understanding between the United States Environmental Protection Agency (EPA) and the Louisiana Department of Environmental Quality (LDEQ) under the Criteria for Direct Federal Enforcement paragraph 6, the EPA is submitting for your review a copy of a RCRA Compliance Evaluation Inspection Report conducted at the SBA Shipyards located in Jennings, Louisiana and informing LDEQ that the EPA plans to take direct enforcement action against this facility.

If you have any questions or comments about this case, please contact me or have a member of your staff call Gregory Pashia at (214) 665-2287.

Sincerely Yours,

Randall E. Brown, Chief
RCRA Enforcement Branch

Enclosure

cc: Mr. Wayne Desselle, Program Manager
Hazardous Waste Division
Louisiana Department of Environmental Quality

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R06024 from the U.S. Environmental Protection Agency (EPA) Region 6 under Contract No. 68-W4-0007—Resource Conservation and Recovery Act (RCRA) Enforcement, Permitting, and Assistance (REPA). Under this work assignment, PRC is providing EPA Region 6 with technical support at the SBA Shipyards, Inc. (SBA), site near Jennings, Louisiana.

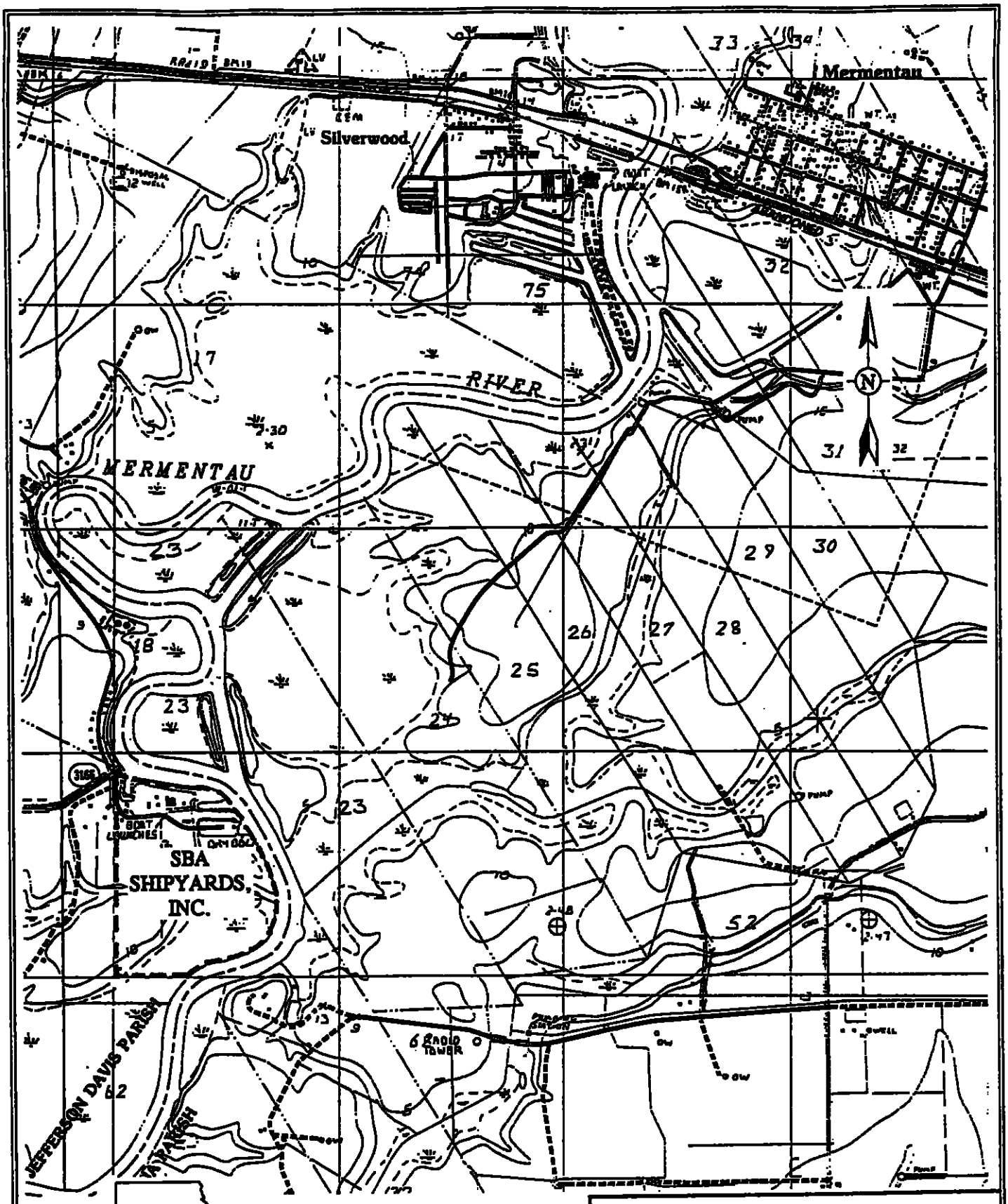
For this work assignment, PRC conducted a compliance evaluation inspection (CEI) and collected multimedia samples. Specifically, PRC evaluated the facility's compliance with the requirements of Title 40, Code of Federal Regulations Part 265—Interim Status Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities. This summary report describes the inspection and sampling activities, summarizes the analytical results, and is accompanied by a completed EPA Region 6 CEI checklist.

2.0 BACKGROUND

SBA is a barge repair and cleaning operation located on the Mermentau River near Jennings, Jefferson Davis Parish, Louisiana (Figure 1). Since the mid-1960's, the 98-acre facility has repaired, sandblasted, cleaned, and painted barges. Barges serviced at SBA have typically held gasoline, diesel, coal tar, crude oil, and asphalt. Waste from the barges and the washout solutions that are used to clean the barges are treated and stored in three unlined surface impoundments on site. A fourth impoundment is out of service and has been partially backfilled.

Other solid waste management units (SWMU) include (1) a solid waste landfill, in which several thousand paint containers have been deposited, and (2) a landfarm, on which sludge from the surface impoundments is dewatered and treated. Section 3.1 discusses the SWMUs in detail.

The surface impoundments and landfarm area are within 200 yards of the Mermentau River; the landfill is within 200 feet of the river. Runoff from the landfarm area and one of the impoundments enters a drainage canal, which discharges into the Mermentau River and adjacent wetlands. Borings


Mermentau
Silverwood
RIVER
MERMENTAU
SBA
SHIPYARDS,
INC.
SBA SHIPYARDS, INC.
JENNINGS, LOUISIANA
FIGURE 1
SITE LOCATION MAP
QUADRANGLE LOCATION
LOUISIANA
0 1000 2000
SCALE IN FEET
SOURCE: MODIFIED FROM USGS, MERMENTAU, LOUISIANA QUADRANGLE, 1984
PRC Environmental Management, Inc.

placed around the surface impoundments have revealed the presence of free-phase hydrocarbons at a depth of 10 to 15 feet, but the nearby monitoring wells are screened at a depth of 15 to 25 feet below ground surface (bgs). The screen interval for the monitoring wells is set below the recorded depth of the free-phase hydrocarbons. Several privately-owned residences, within 1/2 mile of the site, may use groundwater as a source of drinking water.

In 1993, samples analyzed by the Louisiana Department of Environmental Quality (LDEQ) indicated that the sludges in two of the impoundments are hazardous waste, because they failed the toxicity characteristic leaching procedure (TCLP) test. F-listed chlorinated solvents (tetrachloroethene, trichloroethene [TCE], and 1,2-dichloroethane [DCA]) have also been identified in the sludges. The facility is operating without interim status or a standard permit.

LDEQ issued SBA a compliance order, a penalty order, and an administrative order. However, SBA has appealed all enforcement actions and continues to operate the surface impoundments. LDEQ referred the site to EPA.

3.0 FIELD ACTIVITIES

PRC conducted the SBA CEI on August 24 and 25, 1994. During the CEI, PRC (1) conducted a site reconnaissance to become familiar with site activities and identify SWMUs or other areas of concern, (2) completed a CEI checklist provided by the EPA Region 6 Environmental Services Division, and (3) collected multimedia samples to determine whether hazardous wastes were present at the site. The following personnel were present during all or part of the CEI:

- Louis Smaihall — SBA Shipyards
- Gregory Pashia — EPA
- Roy Varnado — LDEQ
- Paul Dubois — PRC
- Wade Pierson — PRC
- Luis Vega — PRC

3.1 CONDUCT SITE RECONNAISSANCE

PRC conducted the site reconnaissance on the morning of August 24, 1994, after PRC, EPA, and LDEQ personnel had arrived on site. Mr. Louis Smaihall, the facility owner and operator, provided a guided tour of the impoundment, landfarm, and landfill areas. During the tour, Mr. Smaihall identified several SWMUs that may contain hazardous waste. The following subsections describe the SWMUs and potential SWMUs that were observed during the site reconnaissance. Figure 2 illustrates the site facilities and Figure 3 is a detailed illustration of the impoundment area.

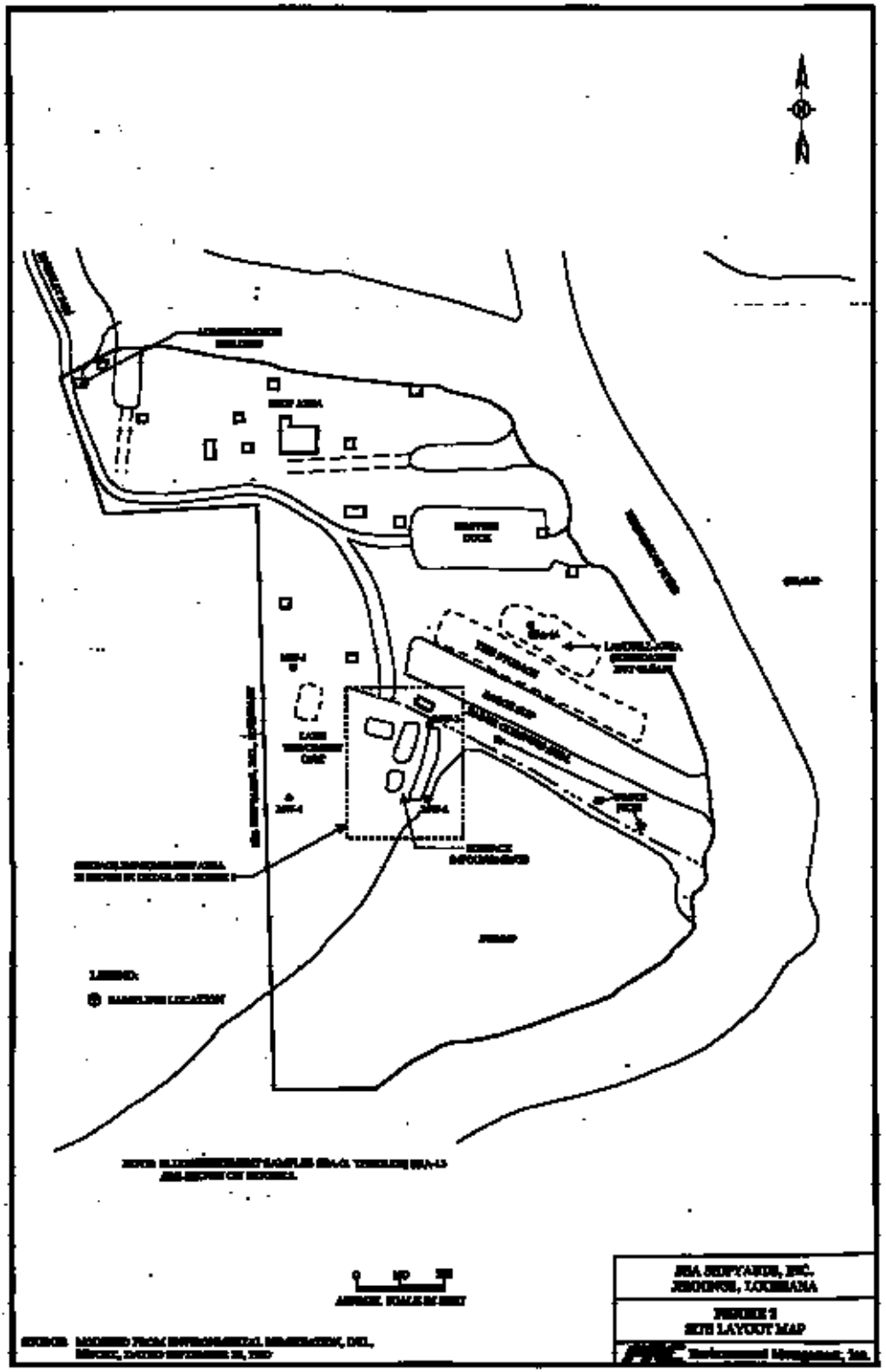
Most of the SWMUs are associated with the treatment and storage of wastewaters generated during barge cleaning operations. The wastewaters are treated only by gravity separation. Four surface impoundments and several tanks are used for wastewater treatment and storage of sludge and waste oil.

3.1.1 Surface Impoundments

Four surface impoundments are located on site. Three of the impoundments are active, and one is inactive. The surface impoundments are used to treat and store wastewater and sludges generated during barge cleaning activities. Mr. Smaihall stated that the impoundments were excavated in about 1968, and the soils below the impoundments consist of clay to a depth of 20 to 25 feet bgs. The following subsections describe the surface impoundments.

3.1.1.1 Oil Pit

Wash water, oils, and other waste fluids are placed in the oil pit. The oil pit also receives oils that were separated in other impoundments and tanks. From the oil pit, wastewaters are pumped into an oil/water separator. The oil pit is about 100 feet long, 75 feet wide, and 18 feet deep. At the north end of the impoundment, the perimeter dike is more than 5 feet above the surrounding ground surface, which indicates that the dikes may have been built up to increase impoundment volume. There are less than 2 feet of freeboard at the north end of the impoundment. The liquids in the impoundment appear to be mostly oils and sludges. A thick crust is on about one-fourth of the impoundment surface.



APPROX. SCALE IN FEET

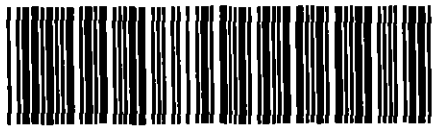
SOURCE: IMAGERY FROM ENVIRONMENTAL RESOURCES, INC., REPORT, DATED SEPTEMBER 30, 1997

JSA SERVICES, INC.
JENNINGS, LOUISIANA

FIGURE 2
SITE LAYOUT MAP

Environmental Management, Inc.

Reference Sheet



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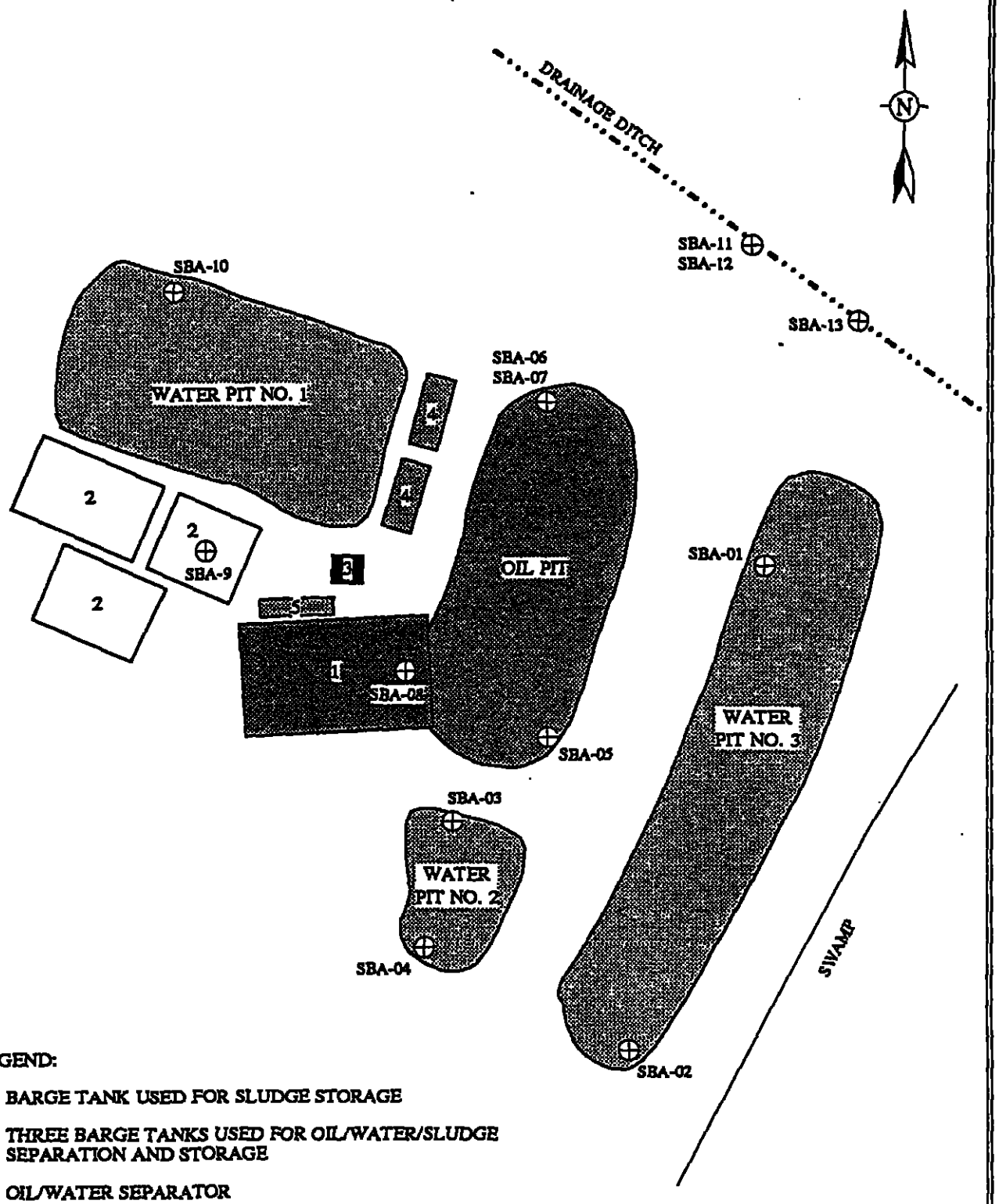

LEGEND:

1 BARGE TANK USED FOR SLUDGE STORAGE

2 THREE BARGE TANKS USED FOR OIL/WATER/SLUDGE SEPARATION AND STORAGE

3 OIL/WATER SEPARATOR

4 ASPHALT STORAGE TANK

5 OIL TANK

⊕ SAMPLING LOCATION

NOT TO SCALE

SOURCE: MODIFIED FROM ENVIRONMENTAL REMEDIATION, INC., REPORT, DATED SEPTEMBER 19, 1990

SBA SHIPYARDS, INC.
JENNINGS, LOUISIANA

FIGURE 3
SURFACE IMPOUNDMENT AREA

PRC Environmental Management, Inc.

In 1993, LDEQ performed TCLP analysis of sludge samples that SBA had collected from the oil pit. These samples indicated that the sludges failed the TCLP test for benzene, tetrachloroethylene, TCE, and 1,2-DCA. In 1990, an estimated 3,873 cubic yards of sludge were present in the oil pit.

3.1.1.2 Water Pit 1

Water pit 1 is currently inactive and has undergone partial closure. During its operation, water pit 1 received wastewaters from the oil pit and the oil/water separator. Oil was returned to the oil pit, and water was pumped to water pit 2.

In 1990, SBA began closure of the impoundment by using aerators to biologically treat the wastewater and sludges. An estimated 2,542 cubic yards of sludge were present in the impoundment before closure activities began. The aerators failed. In 1992, SBA implemented a new closure technique. Liquids were pumped from the impoundment back into the oil pit, and the sludges were solidified by mixing them with fly ash and lime. About one-third of the stabilized sludges was removed from the impoundment and placed on the land treatment unit. The remaining sludges were piled up at the southeast end of the impoundment.

During the reconnaissance, surface water runoff was observed in the impoundment. Hydrocarbon sheens were also observed on the water surface.

3.1.1.3 Water Pit 2

Water pit 2 is about 50 feet wide, 75 feet long, and 6 feet deep. The impoundment is located south of the oil pit. The impoundment receives water from the oil/water separator and is used for additional gravity separation of oil from wastewater. Water is drained into water pit 3, and oil is returned to the oil pit.

The sludges in water pit 2 were very oily, and black staining was observed around the impoundment. Hydrocarbon sheens were also observed on the water surface. In several areas, the impoundment did not have at least 2 feet of freeboard. In 1990, SBA estimated that 297 cubic yards of sludge were present in this impoundment.

3.1.1.4 Water Pit 3

Water pit 3 is about 150 feet long, 50 feet wide, and 6 feet deep. Water pit 3 receives wastewater from water pit 2. The water in this pit is used in the barge cleaning operations. According to Mr. Smaihall, no wastewaters are discharged to the Mermentau River.

The sludges in water pit 3 were oily, and small sheens were observed during sampling. In 1990, SBA estimated that no sludges were present in this impoundment.

3.1.2 Tanks

The oil/water tanks consist of three converted barge tanks. The three tanks were built by cutting a barge into three sections, sealing the ends, and placing the barges upside-down next to water pit 1. The tanks, which have a total capacity of about 9,500 barrels, are used to store and separate oil, water, and sludge. Small tanks were observed at the west end of one of the tanks.

The sludge storage tank is a converted barge that is located on the west side of the oil pit. According to Mr. Smaihall, the barge was sealed, overturned, and tested for leaks before entering service. The tank is used to store sludges from the other tanks and the impoundments. The tank is nearly full, and several small leaks were observed on the west side of the barge.

The barge slip tank is a full-size barge that was buried in the barge slip levee. The surface of the tank is about 1 foot above ground surface. The barge was full of oil at the time of the inspection.

3.1.3 Landfill

The landfill is located between the barge slip and the graving dock. Mr. Smaihall stated that the landfill was just a swampy area in which SBA routinely disposed of brush and trash. He also stated that a few paint cans may be present in the landfill. During the reconnaissance, brush, trash, and several paint cans were observed. The landfill area is also used for the disposal of asphalt. Asphalt is apparently dumped directly onto the ground. Sand is occasionally spread on top of the asphalt.

An aerial photograph on the wall of the administration building indicates that the landfill area may have been used as an impoundment. LDEQ has also reported that thousands of paint cans have been disposed of in the landfill.

The landfill does not have surface water runon and runoff controls, permanent cover, leachate collection, or groundwater monitoring wells.

3.1.4 Land Treatment Unit

In early 1992, SBA began using a land treatment unit to treat solidified sludges that had been removed from water pit 1 during closure of the impoundment. The land treatment unit, which is located about 200 feet northwest of water pit 1, is about 100 feet wide and 200 feet long. The stabilized sludges were placed directly onto the ground surface. The ground surface slopes to the northeast, and there is no surface water runon or runoff control.

The sludges in the water pit were stabilized with fly ash and lime. About one-third of the water pit 1 sludges were placed in the land treatment unit. Mr. Smaihall stated that the unit was tilled regularly. Mr. Smaihall also stated that over 1 year has elapsed since the sludges placed on the land treatment unit were last tilled. No closure or postclosure care measures have been enacted for the land treatment unit. Currently, the unit is devoid of vegetation, and surface water runoff forms small puddles in the grass that is north of the unit.

3.1.5 Waste Piles

PRC observed several waste piles, which are described in the following subsections. All of the waste piles consist of waste materials that have been placed directly onto the ground surface.

3.1.5.1 Barge Cleaning Waste Piles

Several waste piles were observed along the barge slip levee. According to Mr. Smaihall, the waste piles contain (1) asphalt sludges removed from the barges during cleaning, and (2) sand. Sand was apparently mixed with the sludges to solidify the waste. One large waste pile was located in the

middle of the barge slip levee near the barge cleaning area, and several other waste piles were located in the brush and trees along the west side of the levee, between the levee and the swamp.

3.1.5.2 Piles of Used Tires

In 1992, SBA leased an 8-acre tract of land between the landfill and the barge slip to Tiretech Environmental Services, Inc. In October 1992, Tiretech began storing tens of thousands of used tires on the leased tract. Tiretech later went out of business, and the tires are still present.

3.1.6 Drainage Ditch

A small drainage ditch is located between the barge cleaning area and the impoundment area. The ditch drains the western part of the site. Oily sediments and hydrocarbon sheens were observed in the ditch. The ditch drains to the south, into a wetlands and swamp area and, ultimately, into the Mermentau River.

3.2 COMPLETE CEI CHECKLIST

After completing the site reconnaissance, PRC began completing the CEI checklist provided by the EPA Region 6 Environmental Services Division. The purpose of the checklist is to document site conditions, practices, and procedures with regard to regulatory requirements. PRC completed the checklist on the basis of (1) interviews with the site owner, Mr. Louis Smaihall, (2) historical site information, and (3) observations made during the site reconnaissance and sampling activities. Appendix A contains the completed checklist.

3.3 COLLECT MULTIMEDIA SAMPLES

PRC collected sludge and sediment samples from the site to determine whether these media were characteristically hazardous and whether they contained hazardous substances. PRC collected groundwater samples to evaluate whether the groundwater zone monitored by the site monitoring wells has been contaminated by a release from SWMUs on site.

Before sampling activities began, PRC offered SBA the opportunity to split samples with PRC. Mr. Louis Smaihall declined the opportunity to split samples.

3.3.1 Sampling Locations

Mr. Gregory Pashia, EPA RCRA enforcement officer, determined the sampling locations in consultation with PRC. Figures 2 and 3 show the sample locations, which are as follows:

- Active surface impoundments (three)
  - Two sludge samples from each
- Inactive surface impoundment
  - One sludge sample
- Two barge tanks in the surface impoundment area
  - Two sludge samples
- Area of ponded water on top of the landfill area
  - One sediment sample
- Drainage ditch between the impoundment and barge cleaning areas
  - Two sediment samples
- Monitoring wells MW-1, MW-2, and MW-3
  - Three groundwater samples

Table 1 provides sample locations and descriptions. Appendix B contains photographs of the sampling. Appendix C contains sample documentation. Appendix D contains a copy of the site logbook.

3.3.1.1 Sludge and Sediment Samples

PRC collected (1) sludge samples from the four impoundments and two tanks, and (2) sediment samples from an area of ponded water over the landfill, and from the drainage ditch between the impoundment and barge cleaning areas. PRC collected sludge and sediment samples by using the

TABLE 1

SAMPLE DESIGNATIONS AND DESCRIPTIONS

Sample Number	Sample Description
SBA-01	Grab sludge sample collected from the east end of water pit 3
SBA-02	Grab sludge sample collected from the west end of water pit 3
SBA-03	Grab sludge sample collected from the north end of water pit 2
SBA-04	Grab sludge sample collected from the south end of water pit 2
SBA-05	Grab sludge sample collected from the south end of the oil pit
SBA-06	Grab sludge sample collected from the north end of the oil pit
SBA-07	Duplicate grab sludge sample collected from the north end of the oil pit (duplicate of sample SBA-06)
SBA-08	Grab sludge sample collected from the barge tank immediately west of the oil pit
SBA-09	Grab sludge sample collected from the barge tank closest to the oil/water separator
SBA-10	Grab sludge and sediment sample collected from the north end of water pit 1, which is inactive and has been excavated
SBA-11	Grab sediment sample collected from the drainage ditch west of the barge cleaning area
SBA-12	Duplicate grab sediment sample collected from the drainage ditch (duplicate of sample SBA-11)
SBA-13	Grab sediment sample collected from the drainage ditch downgradient of SBA-10 and SBA-11
SBA-14	Grab sediment sample collected within the landfill area, below a layer of deposited asphalt and ponded water
SBA-MW01	Grab groundwater sample collected from monitoring well MW-1
SBA-MW02A	Grab groundwater sample collected from monitoring well MW-2
SBA-MW02B	Duplicate grab groundwater sample collected from monitoring well MW-2 (duplicate of SBA-MW02A)
SBA-MW03	Grab groundwater sample collected from monitoring well MW-3

following sampling method:

- Use dedicated disposable polyethylene scoops attached to 10-foot-long polyvinyl chloride poles.
- Lower the scoops into the sludges or sediment, and place samples in dedicated stainless steel bowls.
- Make multiple grabs at each sampling location to obtain sufficient sample volume.
- After obtaining an adequate sample volume, homogenize the sludge and sediment in the bowl with a dedicated stainless steel spatula or spoon.
- Place the sample in the appropriate sample containers.
- Seal and label the sample containers, and place them on ice in a cooler.

3.3.1.2 Groundwater Samples

PRC collected groundwater samples from three of the four monitoring wells on site—MW-1, MW-2, and MW-3. These wells are located between the impoundment and landfarm area and the Mermentau River, as shown on Figures 2 and 3. PRC collected groundwater samples by using the following method:

- Measure the depth to groundwater from top of casing and the total depth of the well by using an electronic water level indicator.
- Determine the liquid volume in each well casing by using the height of the water column and the radius of the well (1 inch). Record volume calculations in the site logbook.
- Purge three well volumes of groundwater from the well by using a dedicated disposable bailer and nylon cord. Bail purge water into a 5-gallon bucket, then place it in water pit 3.
- After purging, collect groundwater samples by pouring water directly from the bailer into appropriate sample containers provided by the laboratory (the laboratory added preservatives to the appropriate containers, as necessary, before delivery to PRC).
- Seal and label filled sample containers, and place them on ice in a cooler.

3.3.1.3 Quality Control Samples

PRC collected quality control (QC) samples to assess the precision, accuracy, representativeness, completeness, and comparability of analytical laboratory data. This subsection describes the types of QC samples that were collected.

PRC collected field duplicate samples to document the precision of field collection and laboratory analysis procedures between samples. Collection procedures for field duplicate samples were consistent with those used for all samples collected for each matrix. Field duplicate samples were collected at a frequency of one per 10 samples collected for each matrix.

PRC collected equipment and rinsate blank samples to identify (1) contamination from sampling equipment that has not been adequately decontaminated, (2) cross contamination from previously collected samples, and/or (3) contamination from field conditions during the collection of samples. Equipment blanks were collected by pouring high-performance liquid chromatography (HPLC) water over or through equipment that comes into direct contact with the samples. Dedicated and disposable equipment was used at each sampling location. Therefore, PRC collected equipment blanks by pouring the HPLC water over or through pre-cleaned equipment before use. Equipment blank samples were collected at a frequency of one per 10 samples collected for each matrix.

Field blank samples are intended to identify contamination from ambient field conditions. Field blanks, which consist of reagent-grade HPLC water, were collected in the field. Field blanks were collected at a frequency of one per 10 samples collected for volatile organic analysis (VOA).

Matrix spike/matrix spike duplicate (MS/MSD) samples are used to check the precision and accuracy of the analytical laboratory instruments. Laboratory analysis of MS/MSD samples was based on a sample frequency of one per 10 samples collected for each matrix and concentration level.

Trip blank samples are intended to identify contamination from transportation of sample containers or handling of sample containers in the field and laboratory. Trip blanks, which consist of reagent-grade HPLC water, were prepared in a clean environment. Trip blanks were stored in the cooler with the

samples during collection and packaging, and included in the shipment to the laboratory. Trip blank samples were collected at a frequency of one per sampling event for VOA.

The laboratory will be required to analyze interlaboratory split and matrix samples to ensure the precision and accuracy of the analytical laboratory instruments. The laboratory will (1) perform the analysis by using methods specified in the Contract Laboratory Program (CLP) statement of work, and (2) provide CLP-type data packages.

3.3.2 Sample Documentation and Custody

PRC followed the sample documentation and custody procedures set forth in PRC's Quality Assurance Project Plan, dated August 24, 1994, and discussed in the following subsections.

3.3.2.1 Sample Documentation

PRC used a bound logbook to record observations and activities associated with sampling. Information recorded was sufficient to reconstruct the site activity without relying on the collector's memory. The logbook was kept in the possession of a PRC field team member at all times. Information recorded in the logbook includes (1) names and organizations of the people involved in the field activity, (2) a description of the field sampling activity, (3) all pertinent information regarding sample number, location, and the time at which each sample was collected, (4) photographs, and (5) general field observations. Appendix D contains a copy of the site logbook.

PRC provided SBA with sample receipts and copies of the chain-of-custody forms. Appendix C contains copies of this sample documentation.

3.3.2.2 Sample Packaging and Shipment

PRC identified each sample container with a gummed label. Label information, which was applied by using waterproof ink, includes (1) the sample designation, (2) the sampling date and time, (3) the type of analysis that was requested, and (4) the preservation measures that were used. PRC placed a custody seal over the lid of each sealed sample container to prevent it from being reopened after being

filled. PRC wrapped each sample container in clear plastic bags with labels facing outward. The sealed and bagged sample containers were placed into coolers with double-bagged ice.

PRC completed chain-of-custody forms in triplicate. Two copies were placed inside each cooler being shipped to the laboratory, and the other copy will be retained by PRC personnel. The documentation records accompanying each cooler were sealed in a plastic bag and taped securely to the inside of the cooler lid. The cooler lids were secured with strapping tape for shipment.

Two custody seals were placed at the front left and rear right sides of the cooler so that the cooler lid cannot be opened without breaking the seals. To ensure that sample holding times would not be exceeded, two sample deliveries were made to the subcontracted laboratory. The samples collected on Wednesday, August 24, 1994, were picked up by the laboratory courier on Thursday, August 25. Samples collected on Thursday, August 25, were delivered by PRC directly to the laboratory in Baton Rouge.

3.3.3 Analytical Methods

PRC contracted with West-Paine Laboratories in Baton Rouge, Louisiana, to perform sample analysis to determine whether (1) the samples exceed toxicity characteristic levels, (2) Appendix VIII constituents are present in the sludge and sediment samples, and (3) Appendix IX constituents are present in the groundwater samples. Summary tables for the analytical data are presented in Appendix E. These results indicate that in several sludge/sediment samples, toxicity characteristic levels of benzene and vinyl chloride were exceeded, and Appendix VIII constituents were present.

3.3.4 Investigation-Derived Waste

Investigation-derived waste generated during sampling consisted of personal protective equipment and disposable sampling equipment. Gross sediment and sludge on the sampling equipment was returned to the sampling location. Disposable equipment was double-bagged in plastic and relinquished to the site owner, Mr. Louis Smaihall, for disposal as solid waste.

4.0 SUMMARY

PRC conducted a CEI of the SBA Shipyards, Inc., facility near Jennings, Louisiana. The facility is a barge cleaning and repair facility. During the inspection, PRC observed the following waste management units:

- Four surface impoundments for the treatment and storage of wastewater and sludges
- Four converted barge tanks used for separation and storage of oil, water, and sludge
- Several waste piles containing asphalt sludges
- One landfill
- One drainage ditch
- One pile of used tires

PRC collected samples from several of these units to determine whether hazardous wastes were present in the units. PRC also collected samples from three monitoring wells on site. The laboratory data was submitted to EPA separately. These data, which are summarized in Appendix E, indicate that in several sludge/sediment samples, toxicity characteristic levels of benzene and vinyl chloride were exceeded, and Appendix VIII constituents were present.

APPENDIX A

CEI CHECKLISTS

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LADOO84341 85

RCRA COMPLIANCE INSPECTION REPORT
GENERATORS CHECKLIST

NOTE: On multiple part questions, circle those not in compliance.

EPA Identification NO. (262.12)

1. Does the Generator have an EPA I.D. No.? ___Yes ___No
   A. If yes, what is that number?
   LADOO6434185

Hazardous Waste Determination (262.11)

1. Does the generator generate hazardous waste(s) listed in Subpart D? (261.30 - 261.33 - List of Hazardous Waste) ___Yes X No
   a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste Number, waste name and description).

2. Does the generator generate solid waste(s) that exhibit hazardous characteristics? (circle those applicable - corrosivity, ignitability, reactivity, EP toxicity) (261.20 - 261.24 - Characteristics of Hazardous Waste) X Yes ___No
   a. If yes, list wastes and quantities on attachment (Include EPA Hazardous Waste Number, Waste Name and Description.) See note 1
   b. Does the generator determine characteristics by testing or by applying knowledge of processes?
      i. If determined by testing, did the generator use test methods in Part 261, Subpart C (or Equivalent)? ___Yes ___No
      ii. If equivalent test were methods used, attach copy of equivalent methods used.

3. Are there any other solid wastes deemed non-hazardous generated by the generator? (i.e. process waste streams, collected matter from air pollution control equipment, water treatment sludge, etc.) X Yes ___No
   a. If yes, did the generator determine non-hazardous characteristics by testing or knowledge of process? See note 2

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

i. If determined by testing, did the generator use test methods in Part 261, Subpart C (or Equivalent)? ___Yes___No

ii. If equivalent test methods were used, attach copy of equivalent methods used.

b. List wastes and quantities deemed non-hazardous or processes from which non-hazardous wastes were produced. (Use narrative explanations sheet)

4. Are any wastes recycled, reused or reclaimed on-site? X Yes___No

If yes, use narrative sheet to describe the type and quantity of the waste and the method used for reclamation. See note 3.

5. Are any wastes shipped off-site for reclamation? X Yes___No

If yes, use narrative to describe the type and quantity of the waste and its destination. Also give a description of storage prior to shipment. See note 4.

6. Is the total quantity of hazardous wastes generated?

a. Less than 100 kg/month? ___Yes___No

b. More than 1000 kg/month? Unknown ___Yes___No

c. More than 100 but less than 1000 kg/month? ___Yes___No

Manifest

1. Does the generator ship hazardous waste off-site? ___Yes X No

a. If no, do not fill out Section C and D.

b. If yes, identify primary off-site facility(s). (Use narrative explanations sheet)

2. Has the generator shipped hazardous waste off-site since November 19, 1980? ___Yes X No

3. Is the generator exempted from regulation because of:

Small quantity generator (261.5 - Special requirements) ___Yes X No

OR

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD009434185

Produces only non-hazardous solid waste at this time (261.4 - Exclusions) ___Yes X No

4. If the generator is exempted as a small quantity generator are the following requirements met?

   a. The waste is reclaimed under a contractual agreement in which:

      i. The type of waste and frequency of shipments specified in the agreement? ___Yes___No

      ii. The vehicles used to transport the waste to the recycling facility and to deliver regenerated material back to the generator is owned and operated by the reclaimer of the waste? ___Yes___No

   b. The generator maintains a copy of the reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement? ___Yes___No

Required Information (262.21)

5. If not exempted does the generator use manifest? X Yes___No

   a. If yes, does manifest include the following information (262.21 - Required information) X Yes___No

      (Circle those not on manifest) See note 5.

      i. Manifest Document No.

      ii. Generators Name, Mailing Address, Tele. No.

      iii. Generator EPA I.D. No.

      iv. Transporter(s) Name and EPA I.D. No.

      v. Facility Name, Address and EPA I.D. No.

      vi. DOT description of the waste

      vii. a. Quantity (weight or volume)
           b. Containers (type and number)

      viii. Emergency Information (optional) (Special handling instructions, Phone No.)

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LADOO843185

ix. Waste minimization certification

x. Is the following certification on each manifest form? X Yes ___ No

This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation and the EPA.

Uses of the Manifest (263.23)

6. Does the generator retain copies of manifests? ___ Yes ___ No

(Check completed manifests at random. Indicate how many manifests were inspected, how many violations were noted and the type of violation.)

If yes, complete a through e. If questions contain more than one item, circle those not in compliance.

a. i. Did the generator sign and date all manifests inspected? ___ Yes ___ No

ii. Who signed for the generator?
Name:_____
Title:_____
I.D. Number_____

b. i. Did the generator obtain handwritten signature and date of acceptance from initial transporter? ___ Yes ___ No

ii. Who signed for the transporter?
Name:_____
Title:_____
I.D. Number:_____

c. Does the generator retain one copy of manifest signed by generator and transporter? ___ Yes ___ No

d. Do returned copies of manifest include facility owner/operator signature and date of acceptance? ___ Yes ___ No

e. If copy of manifest from facility was not returned within 45 days, did the generator file an exception report? (262.42 - Exception reporting) ___ Yes ___ No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

i. If yes, did it contain the following information:

Legible copy of manifest ___Yes___No

AND

Cover letter explaining generators efforts to locate waste. ___Yes___No

f. Does (will) the generator retain copies for 3 years? ___Yes___No

Pre-Transport Requirements

1. Does the generator package waste? ___Yes_X_No

If no, skip to question 9.
If yes, complete the following questions.

Inspect containers ready for immediate shipment.
If there are no such containers, skip to question 8.

2. Does the generator package waste in accordance with 49 CFR 173, 178, and 179? (DOT requirements) (262.30 - Packaging) ___Yes___No

3. Are containers to be shipped leaking, corroding or bulging? ___Yes___No

Use narrative explanations sheet to describe containers and condition.

4. Does the generator use DOT labeling requirements in accordance with 49 CFR 172 when containers are offered for shipment? (262.31 - Labeling) ___Yes___No

5. Does the generator mark each package in accordance with 49 CFR 172 when containers are offered for shipment? (262.32 - Marking) ___Yes___No

6. a. Is each container of 110 gallons or less marked with the following label when containers are offered for shipment? ___Yes___No

HAZARDOUS WASTE - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. Environmental Protection Agency.

Generator's Name and Address _____

Manifest Document Number_____

b. If other labels exist, list in narrative.

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

7. If there are any vehicles present on site loading or unloading hazardous waste, inspect for presence of placards. Note this instance on narrative explanation sheet.

8. Satellite Accumulation (effective June 20, 1985)

a. Does the generator accumulate waste in containers at or near "Satellite" generation points? ___Yes___No

If no, skip to question 9.
If yes, complete the following.

b. Are containers in good condition? ___Yes___No

c. Is the waste compatible with the containers? ___Yes___No

d. Is waste transferred from leaking containers or otherwise managed to control leakage? ___Yes___No

e. Are containers closed? ___Yes___No

f. Are containers marked with the words "hazardous waste" or identification of the contests? ___Yes___No

g. Has waste accumulation exceeded one (1) quart of acutely hazardous waste (261.33 e.) or 55 gallons of other hazardous waste? ___Yes___No

If yes,

i. Has the container holding the excess amount been marked with the date the excess began accumulating? ___Yes___No

ii. Have excess amounts remained in the satellite accumulation area longer than three (3) days? ___Yes___No

9. Accumulation Time (262.34 - Accumulation Time for Small Quantity Generators)

a. Is waste generated > 100 kg/month, but < 1000 kg/month? ___Yes___No Un Known

If yes, answer rest of question #9.
If no, skip to question #10.

b. Is hazardous waste shipped offsite within 180 days? ___Yes_X_No

c. Has the quantity of waste accumulated on-site exceeded 6000 kilograms? ___Yes___No Unknown

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

d. Does the generator comply with the requirements of Part 265 Subpart C, Preparedness and Prevention? X Yes ___ No

10. Accumulation Time (262.34 - Accumulation Time)

a. Is the site a permitted/interim status storage facility? ___ Yes X No

If yes, skip to Section E, and complete and attach the TSD checklist and appropriate supplemental checklists. If no,answer rest of question #8.

b. Is hazardous waste shipped offsite within 90 days? ___ Yes X No

c. Is waste stored in containers or tanks? X Yes ___ No

d. Is the beginning date of accumulation time clearly indicated on each container? ___ Yes X No

e. Is each container or tank marked with the words "Hazardous Waste"? ___ Yes X No

f. Complete and attach the containers/tanks supplemental checklists as appropriate.

g. If the generator accumulates waste on-site for less than 90 days, complete RCRA Generators Checklist Supplement.

Recordkeeping and Report

1. Is the generator keeping the following reports for a minimum of three (3) years? (262.40 - Recordkeeping):

a. Manifests and signed copies from designated facilities? X Yes ___ No

b. Biennial reports (or reports as required by state agencies) ___ Yes X No

c. Exception Reports ___ Yes X No

d. Test results, where applicable. X Yes ___ No

2. Where are records kept (at facility or elsewhere)?

Facility

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

3. Who is in charge of keeping the records?

Name: Louis Smaihall

Title: Owner

Special Condition

1. Has the generator received from or transported to a foreign source any hazardous waste? (262.50 - International Shipments) ___Yes X No

If yes,

a. Has a note been filed with the R.A.? ___Yes___No

b. Is this waste manifested and signed by Foreign Consignee? ___Yes___No

c. If the generator transported wastes out of the country has he received confirmation of delivered shipment? ___Yes___No

d. Has the generator filed an annual report (by March 1 of each year) giving the type, quantity, frequency and destination of all exported hazardous waste? (Per HSWA 1984) ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

RCRA GENERATORS CHECKLIST SUPPLEMENT

Personnel Training (265.16)

1. Have facility personnel successfully completed a program of classroom or on-the-job training? ___Yes X No

   a. Does the training program include instructions in the following:

      (1) procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? ___Yes___No

      (2) key parameters for automatic waste feed cut-off systems? ___Yes___No

      (3) operation of communication or alarm systems? ___Yes___No

      (4) response to fires, explosions and groundwater contamination incidents? ___Yes___No

      (5) shutdown of operations? ___Yes___No

      (6) general hazardous waste management procedures? ___Yes___No

   b. Is the program directed by a person trained in hazardous waste management procedures? ___Yes___No

   c. Have personnel completed annual training reviews? ___Yes___No

   d. Does the owner/operator maintain the following documents:

      (1) Job title, job description and name of employee for each position at the facility related to hazardous waste management? ___Yes___No

      (2) Written description of the type and amount of both introductory and continuing training? ___Yes___No

      (3) Written documentation that the training has been completed by facility personnel? ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

Preparedness and Prevention (265.30)

1. Is there evidence of fire, explosion or contamination of the environment? (265.31 - Maintenance and operation of facility) — X Yes ___ No

If yes, use narrative explanations sheet to explain. See note 1

2. Is the facility equipped with (265.32 - Required equipment)

   a. Internal communications or alarm system — X Yes ___ No

   b. Telephone or two-way radio to call emergency response personnel — X Yes ___ No

   c. Portable fire extinguishers, fire control equipment spill control equipment and decontamination equipment — ___ Yes X No

      1. Is this equipment tested to assure its proper operation? — ___ Yes X No

   d. Water of adequate volume for hoses, sprinklers or water spray system — X Yes ___ No

      1. Describe source of water
      Water is pumped from the Mermentau River

      2. Indicate flow rate and/or pressure and storage capacity, if available.
      Unknown

3. Is there sufficient aisle space to allow unobstructed movement of personnel and emergency equipment? (265.35-Required Aisle Space) — X Yes ___ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes.) (265.37 - Arrangements with local authorities) — X Yes ___ No

   If no, has the owner/operator attempted to make such arrangements? — ___ Yes ___ No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

5. In the case that more than one police or fire department might respond, is there a designated primary authority? (265.37 - Arrangements with local authorities) N/A ___Yes ___No

If yes, indicate primary authority:

_____

a. Is the fire department a city or volunteer fire department?

Unknown

6. Does the owner/operator have phone numbers or and agreements with State emergency response teams, emergency response contractors and equipment suppliers? X Yes ___No

Are they readily available to the emergency coordinator? (265.37 - Arrangements with local authorities) X Yes ___No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fires, explosions, or releases at the facility? ___Yes X No

If no, has the owner/operator attempted to do this? (265.37 - Arrangements with local authorities) ___Yes X No

<u>Contingency Plan and Emergency Procedures (265.50)</u> (

1. Does the facility have a contingency plan? (265.52 Content of Contingency Plan) ___Yes X No

a. If yes, does it contain:

1. actions to be taken in response to emergencies? ___Yes ___No

2. description of arrangements with police, fire and hospital officials? ___Yes ___No

3. list of names, addresses, phone numbers of persons qualified to act as emergency coordinator? ___Yes ___No

4. list, including the location and physical description of all emergency equipment? ___Yes ___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

5. evacuation plan for facility personnel including signals, primary and alternate routes? ___Yes___No

2. Is a copy of the contingency plan maintained at the facility? (265.53 - Copies of contingency plan) ___Yes___No

3. Has a copy been supplied to the local police, fire depts., and hospitals? (265.53 - Copies of contingency plan) ___Yes___No

4. Has the contingency plan been updated and amended as necessary? ___Yes___No

5. Is the plan a revised SPCC Plan? (265.52 - Content of contingency plan) ___Yes___No

6. Is there an emergency coordinator on-site or within short driving distance of the plant at all times? ___Yes___No

If yes, list primary emergency coordinator:

_____

_____

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

SUBPART K - SURFACE IMPOUNDMENTS (265.220) Water Pit 1

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility. There are four impoundments at SBA Shipyards. The attached narrative contains specific information.

Closure and Post-closure Care (265.228)

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future? — X Yes ___ No

   a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? — ___ Yes X No

2. Are impoundments presently used to treat or store waste? — X Yes ___ No

General Operating Requirements (265.222)

3. Does the impoundment appear to maintain at least 2 feet (60cm) of freeboard? — X Yes ___ No

   a. If no,

      i. What was the freeboard? — ___ Yes ___ No

      ii. Does the facility have alternate design features or operation plans that will prevent overtopping? — ___ Yes ___ No

      iii. Have the alternate features been certified? — ___ Yes ___ No

4. Is there evidence of overtopping of the dike? — ___ Yes X No

   If yes, please describe.

Containment System (265.223)

5. Do earthen dikes have a protective cover to minimize wind and water erosion? — ___ Yes X No

   Provide description of containment.

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet). — ___ Yes ___ No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

7. Are hazardous wastes chemically treated in the impoundment which are substantially different from wastes previously treated or using different treatment methods than previously used? X Yes ___ No

a. If yes,

i. Are waste analyses and trial tests conducted on these wastes? ___ Yes X No

OR

ii. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? ___ Yes X No

b. Is this information retained in the operating record? ___ Yes X No

Inspections (265.226)

8. Is the impoundment inspected daily to check freeboard level? X Yes ___ No

9. Is the impoundment dike and vegetation surrounding the dike inspected to detect leaks, deterioration or failures at least once a week? X Yes ___ No

Special Requirements for Ignitable or Reactive Waste (265.229)

10. Are ignitable or reactive wastes placed in the impoundment? ___ Yes X No

If no, do not complete b and c.

If yes,

i. Are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? ___ Yes ___ No

ii. Are the wastes managed in such a way that it is protected from any material or condition which may cause it to react? ___ Yes ___ No

iii. Is the impoundment used solely for emergencies? ___ Yes ___ No

A. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation. ___ Yes ___ No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

Special Requirements for Incompatible Wastes (265.230)

11. Has the facility ever placed incompatible wastes in the impoundment? ___Yes X No

    a. If yes, what were the results? Use narrative explanation sheet. (Look for signs of mixing of incompatible wastes e.g. fire, toxic mist, heat generation, bulging containers, etc.)

Design Requirements (265.221)

12. What is the impoundment lined with? No liner ___Yes X No

13. Is the impoundment a new unit, replacement of an existing unit or lateral expansion of an existing unit? ___Yes X No

    If yes,

    a. Has waste been received since May 1985? ___Yes___No

       If yes,

       i. Has the owner/operator notified the Regional Administrator (or state authority) at least 60 days prior to receiving the waste? ___Yes___No

       ii. Has the owner/operator filed an application for a final determination regarding the issuance of the permit within 6 months of the notice to receive wastes? ___Yes___No

       iii. Is the impoundment completed with two or more liners and a leachate collection system between such liners? ___Yes____No

       iv. Does the impoundment have a groundwater monitoring system in place? ___Yes___No

Oil Pit

FACILITY NAME: SEA Shipyards

EPA ID NUMBER: LAD008434185

SUBPART K - SURFACE IMPOUNDMENTS (265.220)

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

Closure and Post-closure Care (265.228)

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future? — X Yes ___ No

   a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? — ___ Yes X No

2. Are impoundments presently used to treat or store waste? — X Yes ___ No

General Operating Requirements (265.222)

3. Does the impoundment appear to maintain at least 2 feet (60cm) of freeboard? — ___ Yes X No

   a. If no,

      i. What was the freeboard? 18 inches — ___ Yes ___ No

      ii. Does the facility have alternate design features or operation plans that will prevent overtopping? — ___ Yes X No

      iii. Have the alternate features been certified? — ___ Yes ___ No

4. Is there evidence of overtopping of the dike? — ___ Yes X No

   If yes, please describe.

Containment System (265.223)

5. Do earthen dikes have a protective cover to minimize wind and water erosion? — ___ Yes X No

   Provide description of containment.

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet). — ___ Yes ___ No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LADC054341855

7. Are hazardous wastes chemically treated in the impoundment which are substantially different from wastes previously treated or using different treatment methods than previously used? ___Yes X No

a. If yes,

i. Are waste analyses and trial tests conducted on these wastes? ___Yes ___No

OR

ii. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? ___Yes ___No

b. Is this information retained in the operating record? ___Yes ___No

Inspections (265.226)

8. Is the impoundment inspected daily to check freeboard level? X Yes ___No

9. Is the impoundment dike and vegetation surrounding the dike inspected to detect leaks, deterioration or failures at least once a week? X Yes ___No

Special Requirements for Ignitable or Reactive Waste (265.229)

10. Are ignitable or reactive wastes placed in the impoundment? ___Yes X No

If no, do not complete b and c.

If yes,

i. Are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? ___Yes ___No

ii. Are the wastes managed in such a way that it is protected from any material or condition which may cause it to react? ___Yes ___No

iii. Is the impoundment used solely for emergencies? ___Yes ___No

A. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation. ___Yes ___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LADCC543419S

Special Requirements for Incompatible Wastes (265.230)

11. Has the facility ever placed incompatible wastes in the impoundment? ___Yes X No

    a. If yes, what were the results? Use narrative explanation sheet. (Look for signs of mixing of incompatible wastes e.g. fire, toxic mist, heat generation, bulging containers, etc.)

Design Requirements (265.221)

12. What is the impoundment lined with? No liner ___Yes X No

13. Is the impoundment a new unit, replacement of an existing unit or lateral expansion of an existing unit? ___Yes X No

    If yes,

    a. Has waste been received since May 1985? ___Yes___No

       If yes,

       i. Has the owner/operator notified the Regional Administrator (or state authority) at least 60 days prior to receiving the waste? ___Yes___No

       ii. Has the owner/operator filed an application for a final determination regarding the issuance of the permit within 6 months of the notice to receive wastes? ___Yes___No

       iii. Is the impoundment completed with two or more liners and a leachate collection system between such liners? ___Yes___No

       iv. Does the impoundment have a groundwater monitoring system in place? ___Yes___No

Water Pit 2

FACILITY NAME: SBH Shipyards

EPA ID NUMBER: LAD008434185

SUBPART X - SURFACE IMPOUNDMENTS (265.220)

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

Closure and Post-closure Care (265.228)

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future? — X Yes ___ No

   a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? — ___ Yes X No

2. Are impoundments presently used to treat or store waste? — X Yes ___ No

General Operating Requirements (265.222)

3. Does the impoundment appear to maintain at least 2 feet (60cm) of freeboard? — ___ Yes X No

   a. If no,

      i. What was the freeboard? 12-18" — ___ Yes ___ No

      ii. Does the facility have alternate design features or operation plans that will prevent overtopping? — ___ Yes X No

      iii. Have the alternate features been certified? — ___ Yes ___ No

4. Is there evidence of overtopping of the dike? — ___ Yes X No

   If yes, please describe.

Containment System (265.223)

5. Do earthen dikes have a protective cover to minimize wind and water erosion? — ___ Yes X No

   Provide description of containment.

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet). — ___ Yes ___ No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LATDCC543415.5

7. Are hazardous wastes chemically treated in the impoundment which are substantially different from wastes previously treated or using different treatment methods than previously used? ___Yes X No

a. If yes,

i. Are waste analyses and trial tests conducted on these wastes? ___Yes___No

OR

ii. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? ___Yes___No

b. Is this information retained in the operating record? ___Yes___No

Inspections (265.226)

8. Is the impoundment inspected daily to check freeboard level? X Yes___No

9. Is the impoundment dike and vegetation surrounding the dike inspected to detect leaks, deterioration or failures at least *once* a week? X Yes___No

Special Requirements for Ignitable or Reactive Waste (265.229)

10. Are ignitable or reactive wastes placed in the impoundment? ___Yes X No

If no, do not complete b and c.

If yes,

i. Are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? ___Yes___No

ii. Are the wastes managed in such a way that it is protected from any material or condition which may cause it to react? ___Yes___No

iii. Is the impoundment used solely for emergencies? ___Yes___No

A. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation. ___Yes___No

FACILITY NAME: BA [illegible]

EPA ID NUMBER: LAD0[illegible]

Special Requirements for Incompatible Wastes (265.230)

11. Has the facility ever placed incompatible wastes in the impoundment? ___Yes X No

    a. If yes, what were the results? Use narrative explanation sheet. (Look for signs of mixing of incompatible wastes e.g. fire, toxic mist, heat generation, bulging containers, etc.)

Design Requirements (265.221)

12. What is the impoundment lined with? No liner ___Yes X No

13. Is the impoundment a new unit, replacement of an existing unit or lateral expansion of an existing unit? ___Yes X No

    If yes,

    a. Has waste been received since May 1985? ___Yes ___No

       If yes,

       i. Has the owner/operator notified the Regional Administrator (or state authority) at least 60 days prior to receiving the waste? ___Yes ___No

       ii. Has the owner/operator filed an application for a final determination regarding the issuance of the permit within 6 months of the notice to receive wastes? ___Yes ___No

       iii. Is the impoundment completed with two or more liners and a leachate collection system between such liners? ___Yes ___No

       iv. Does the impoundment have a groundwater monitoring system in place? ___Yes ___No

Water Pit 3

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

SUBPART K - SURFACE IMPOUNDMENTS (265.220)

NOTE: Check all surface impoundments. Fill out one checklist for any impoundment in violation. Fill out one checklist for all other impoundments in compliance. Indicate number of surface impoundments at the facility.

Closure and Post-closure Care (265.228)

1. Are there any surface impoundments which are not being used which the facility does not plan to use in the future? — X Yes ___ No

   a. If yes, has all hazardous waste and hazardous waste residue been removed from the impoundment? — ___ Yes X No

2. Are impoundments presently used to treat or store waste? — X Yes ___ No

General Operating Requirements (265.222)

3. Does the impoundment appear to maintain at least 2 feet (60cm) of freeboard? — X Yes ___ No

   a. If no,

      i. What was the freeboard? — ___ Yes ___ No

      ii. Does the facility have alternate design features or operation plans that will prevent overtopping? — ___ Yes ___ No

      iii. Have the alternate features been certified? — ___ Yes ___ No

4. Is there evidence of overtopping of the dike? — ___ Yes ___ No

   If yes, please describe.

Containment System (265.223)

5. Do earthen dikes have a protective cover to minimize wind and water erosion? — X Yes ___ No

   Provide description of containment. Vegetation

6. What wastes are treated or stored in the impoundment? (Use narrative explanations sheet). — ___ Yes ___ No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LADCC543418.5

7. Are hazardous wastes chemically treated in the impoundment which are substantially different from wastes previously treated or using different treatment methods than previously used? ___Yes X No

a. If yes,

i. Are waste analyses and trial tests conducted on these wastes? ___Yes___No

OR

ii. Does the owner/operator have written documented information on similar treatment of similar wastes under similar operating conditions? ___Yes___No

b. Is this information retained in the operating record? ___Yes___No

Inspections (265.226)

8. Is the impoundment inspected daily to check freeboard level? X Yes___No

9. Is the impoundment dike and vegetation surrounding the dike inspected to detect leaks, deterioration or failures at least once a week? X Yes___No

Special Requirements for Ignitable or Reactive Waste (265.229)

10. Are ignitable or reactive wastes placed in the impoundment? ___Yes X No

If no, do not complete b and c.

If yes,

i. Are they treated, rendered or mixed before or immediately after placement in the impoundment so it no longer meets the definition of ignitable or reactive? ___Yes___No

ii. Are the wastes managed in such a way that it is protected from any material or condition which may cause it to react? ___Yes___No

iii. Is the impoundment used solely for emergencies? ___Yes___No

A. If yes, has further treatment, storage or disposal been conducted on these wastes? Describe this situation. ___Yes___No

FACILITY NAME: BA Shipyards

EPA ID NUMBER: LADOC543419S5

Special Requirements for Incompatible Wastes (265.230)

11. Has the facility ever placed incompatible wastes in the impoundment? ___Yes X No

    a. If yes, what were the results? Use narrative explanation sheet. (Look for signs of mixing of incompatible wastes e.g. fire, toxic mist, heat generation, bulging containers, etc.)

Design Requirements (265.221)

12. What is the impoundment lined with? No Liner ___Yes X No

13. Is the impoundment a new unit, replacement of an existing unit or lateral expansion of an existing unit? ___Yes X No

    If yes,

    a. Has waste been received since May 1985? ___Yes ___No

       If yes,

       i. Has the owner/operator notified the Regional Administrator (or state authority) at least 60 days prior to receiving the waste? ___Yes ___No

       ii. Has the owner/operator filed an application for a final determination regarding the issuance of the permit within 6 months of the notice to receive wastes? ___Yes ___No

       iii. Is the impoundment completed with two or more liners and a leachate collection system between such liners? ___Yes ___No

       iv. Does the impoundment have a groundwater monitoring system in place? ___Yes ___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

LAND TREATMENT CHECKLIST
(SUBPART M - LAND TREATMENT 265.270)

General Operating Requirements (265.272)

1. Is run-on diverted away from the land treatment facility? ___Yes X No

2. Is run-off from the land treatment facility collected? ___Yes X No

3. Is the run-off analyzed to see if it is a hazardous waste? ___Yes X No

   a. If the run-off is considered hazardous, how is it handled? (Use narrative explanation sheet.)

   b. If it is not a hazardous waste, is it discharged through a point source to surface waters? ___Yes X No

      1. If yes, list NPDES Permit No. _____

4. Is the land treatment facility managed to control wind dispersal? ___Yes X No

Waste Analysis (265.273)

5. What hazardous wastes are treated at the land treatment facility? (Use narrative explanation sheet).

6. For listed wastes, were analyses done to determine the concentrations of those constituents which caused the waste to be listed? ___Yes ___No

   1. If yes, what are these concentrations? (Use narrative explanation sheet)

7. For characteristic wastes designated toxic because of the extraction procedure, what are the concentrations of the following:

	Concentration	Waste
Arsenic		
Barium		
Cadmium		
Chromium		
Lead		
Mercury		
Selenium		
Silver		

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	Concentration	Waste
Endrin		
Lindane		
Methoxychlor		
Toxaphene		
2,4 D		
2,4,5-TP Silvex		

8. Obtain a copy of the land treatment process and include it with the report.

9. Are food chain crops grown? ___Yes X No

   a. If no, skip to question 15.
   b. If yes, complete questions 10-14.

Food Chain Crop (265.276)

10. Was the Regional Administrator notified by January 19, 1981, that food chain crops had been or would be grown at the facility? ___Yes X No

11. Has the owner/operator determined the concentrations in the waste of each of the following:

   a. arsenic ___Yes X No

   b. cadmium ___Yes X No

   c. lead ___Yes X No

   d. mercury ___Yes X No

   Note: Owner/operator may instead present written, documented data that none of the above constituents is present in the waste. Attach a copy of such data, if applicable.

12. Has the owner/operator demonstrated from field testing that any toxic constituents,

   a. Will not be transferred to the food portion of the crop and will not otherwise be ingested by food chain animals? ___ Yes X No

   OR

   b. Will not occur in greater concentrations in the crops grown on the facility than in the same crops grown untreated soils in the same region? ___Yes X No

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13. Is the following information used for making the above demonstration and is it kept at the facility:

a. Tests for the specific wastes and application rates being used at the facility? ___Yes X No

b. Crop characteristics ___Yes X No

c. Soil characteristics ___Yes X No

d. Sample selection criteria ___Yes X No

e. Sample size determination ___Yes X No

f. Analytical methods used ___Yes X No

g. Statistical procedures ___Yes X No

14. Does the facility treat wastes that contain cadmium? ___Yes X No

a. If no, go to question 15.

b. If yes, the facility must comply with either c.-f. or g.

c. Was the pH of the soil/waste mixture 6.5 or greater at the time of each waste application? ___Yes ___No

1. If no, did the waste contain cadmium concentrations of 2mg/kg or less? ___Yes ___No

d. Is the annual cadmium application rate 0.5 kg/hectare or less on land used for production of tobacco, leafy vegetables or root crops grown for human consumption? ___Yes ___No

e. Is the annual cadmium application rate for all food chain crops (other than those listed above) 1.25 kg/hectare or less? (until 12/31/86) ___Yes ___No

f. Does the cumulative application of cadmium comply with the following tables, as applicable:

1. a. For soils with background pH of less than 6.5: ___Yes ___No

Soil cation exchange capacity meq/100g	max. cumulative application (kg/ha)
less than 5	5
5 to 15	5
greater than 15	5

OR

b. For soils with background pH of less than 6.5, but soil/waste mixture adjusted to 6.5 or greater: ___Yes___No

exchange capacity	max. application
less than 5	5
5 to 15	10
greater than 15	20

2. For soils with background pH of 6.5 or greater: ___Yes___No

exchange capacity	max. application
less than 5	5
5 to 15	10
greater than 15	20

g. 1. Is the only food chain crop produced to be used as animal feed? ___Yes___No

2. Is the pH of the waste/soil mixture 6.5 or greater at the time of waste application or crop planting and is this pH maintained? ___Yes___No

3. Does the facility maintain a plan demonstrating how human ingestion of the feed will be prevented? ___Yes___No

4. Has or will a stipulation be placed in the property deed to inform future owners of the high cadmium application and food chain crop restrictions? ___Yes___No

Unsaturated Zone Monitoring (265.278)

15. Has the owner/operator prepared an unsaturated zone monitoring plan? ___Yes_X_No

a. Is the plan designed to:

1. Detect vertical migration of waste and waste constituents? ___Yes___No

2. Provide information on background concentrations of waste and waste constituents in similar but untreated soils nearby? ___Yes___No

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b. Does the plan provide for:

1. Soil monitoring using soil cores? ___Yes___No

2. Soil-pore monitoring using devices such as lysimeters? ___Yes___No

c. Does the owner/operator demonstrate in the plan that:

1. The depth at which samples are taken is below the depth of waste incorporation? ___Yes___No

2. The number of samples taken is based on the variability of soil type and hazardous waste constituents? ___Yes___No

3. The frequency and typing of sampling is based on waste application rates, proximity to groundwater and soil permeability? ___Yes___No

d. Is the soil and soil-pore water analyzed for the hazardous constituents present in the waste? ___Yes_X_No

Recordkeeping (265.279)

16. Does the operating record contain logs of the date and rate of hazardous waste application onto the land treatment facility? ___Yes_X_No

Special Requirements for Ignitable or Reactive Wastes (265.281)

17. Are ignitable or reactive wastes treated at the facility? (Circle appropriate waste) ___Yes_X_No

a. Are the wastes immediately incorporated into the soil so that they are no longer ignitable or reactive? ___Yes___No

OR

b. Is the waste protected from sources of ignition or reaction? ___Yes___No

Special Requirements for Incompatible Wastes (265.282)

18. Are incompatible wastes placed in the same land treatment area? ___Yes_X_No

If yes, check for signs of fire, heat generation, toxic mists. (Explain in narrative.)

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19. Is the lower limit of the land treatment zone at least 3 feet above the seasonally high water table under the land treatment unit. ___Yes___No

Unknown

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LANDFILLS CHECKLIST
(SUBPART N - LANDFILLS, 265.300)

General Operating Requirements (265.302)

1. Is run-on diverted from the landfill? ___Yes X No

2. Is run-off from the landfill collected? ___Yes X No

   a. Is the waste from the collected run-off analyzed to determine if it is a hazardous waste? ___Yes ___No

      1. If it is a hazardous waste, how it is managed? (Use narrative explanations sheet) ___Yes ___No

      2. Is the collected run-off discharged through a point source to surface waters? ___Yes ___No

         a. If yes, list NPDES Permit Number _____

3. Is the landfill managed so that wind dispersal is controlled? (Note blowing debris) ___Yes X No

Surveying and Recordkeeping (265.309)

4. Is the following information maintained in the operating record? ___Yes X No

   a. On a map, the exact location and dimensions, including depth of each cell with respect to permanently surveyed benchmarks? ___Yes X No

   AND

   b. Contents of each cell and the approximate location of each hazardous waste type within each cell? ___Yes X No

Special Requirements for Ignitable or Reactive Wastes (265.312)

5. Are reactive or ignitable wastes in other than containers, placed in the landfill? ___Yes X No

   a. If yes, is it treated, rendered or mixed before or immediately after placement in the landfill so it is no longer reactive or ignitable? ___Yes ___No

b. Describe treatment, etc., or attach a copy of treatment. ___Yes___No

6. Are containerized ignitable wastes placed in the landfill? ___Yes X No

if yes,

a. Check visible containers.

(1). Are containers leaking? ___Yes___No

(2). Are containers handled and placed to avoid heat, sparks and rupture? ___Yes___No

b. Are containers covered daily with soil or other non-combustible material? ___Yes___No

c. Are containers placed in cells that contain or will contain other wastes which may generate heat sufficient to cause ignition of the waste? ___Yes___No

Special Requirements for Icompatible Wastes (265.313)

7. Are incompatible wastes placed in the same landfill cell? ___Yes X No

a. If yes, what were the results? (Use narrative explanations sheet.)

b. Describe how it is possible for incompatible wastes to be placed in the same landfill cell. (Use narrative explanations sheet.)

Special Requirements for Bulk and Containerized Liquids (265.314)

8. Are bulk or non-containerized liquid wastes or wastes containing free liquids placed in the landfill? X Yes ___No

a. If yes, does the landfill have:

1. A liner which is chemically and physically resistant to the added liquid? ___Yes X No

2. A functioning leachate collection and adequate removal system? ___Yes X No

Note: If drawing or written descriptions of the liner and leachate system are available, copy and attach to this report.

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OR

b. Is the liquid waste treated chemically or physically so that free liquids are no longer present? ___Yes X No

Note: Effective May 1985, the placement of bulk or non-containerized liquid hazardous waste or free liquids contained in hazardous waste (whether or not absorbents have been added) in any landfill is prohibited.

9. Are non-hazardous liquid wastes placed in the landfill? See narrative Possibly ___Yes ___No

If yes,

a. Has the owner/operator demonstrated that such placement will not present a risk of contamination to any underground course of drinking water? ___Yes X No

b. Has the owner/operator demonstrated that such placement is the only reasonable alternative? ___Yes X No

10. Are containers holding liquid wastes placed in the landfill? See narrative ___Yes ___No

If yes,

a. Has all free-standing liquid been removed? ___Yes ___No

OR

b. Has waste been mixed with absorbent or solidified so that freestanding liquid is no longer observed? ___Yes ___No

OR

c. Is the container very small, such as an ampule? ___Yes ___No

OR

d. Is the container designed to hold free liquids for use other than storage, such as a battery or capacitor? ___Yes ___No

OR

e. Is the container a lab pack? If yes, answer question 10 also. ___Yes ___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

Disposal of Small Containers of Hazardous Waste in Overpacked Drums (Lab Packs) (265.316)

11. Are small containers in overpacked drums (lab packs) placed in the landfill? ___Yes X No

    If yes, answer a.-g. If containers are not available for inspection, check that proper packaging mateials are available for use.

    a. Is the waste packaged in non-leaking, inner containers which will no react dangerously with the waste? ___Yes___No

    b. Are inner containers tightly and securely sealed? ___Yes___No

    c. Is the inner container surrounded by absorbent material which will not react with the waste? ___Yes___No

    d. Are the inner containers overpacked in an open-head metal shipping container of no more than 110 gallon capacity? ___Yes___No

    e. Is the outer container completely full after packing? ___Yes___No

    f. Are incompatible wastes placed in the same outside container? ___Yes___No

    g. Are reactive wastes, other than cyanide- or sulfide-bearing wastes treated or rendered non-reactive prior to packaging? ___Yes___No

12. Are empty containers placed in the landfill? X Yes___No

    a. If yes, are they reduced in volume (e.g. shredded, crushed)? Some maybe, but not all ___Yes X No

13. Is there evidence of site instability? (e.g., erosion, settling) (Use narrative explanations sheet) X Yes___No

14. Is there evidence of ponding of water on-site or any other indication of improper or inadequate drainage? (Use narrative explanation sheet). X Yes___No

Design Requirements (265.301)

15. Is the landfill a new unit, replacement of an existing unit or lateral expansion of an existing unit? ___Yes X No

FACILITY NAME: SBA Shipyards

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If yes,

a. Has waste been received since May 1985? ___Yes___No

If yes,

1. Has the owner/operator notified the Regional Administrator (or state authority) at least 60 days prior to receiving the waste? ___Yes___No

2. Has the owner/operator filed an application for a final determination regarding the issuance of the permit within 6 months of the notice to receive wastes? ___Yes___No

3. Is the landfill completed with two or more liners and a leachate collection system above and between such liners? ___Yes___No

4. Does the landfill have a groundwater monitoring system in place? ___Yes___No

Closure and Post-closure Care (265.310)

16. Has the landfill or any Landfill cell undergone final closure? ___Yes X No

A. If yes, is the final cover designed and construct to:

1. Provide long term minimization of migration of liquids through the closed landfill? ___Yes___No

2. Function with minimum maintenance? ___Yes___No

3. Promote drainage and minimize erosion? ___Yes___No

4. Accomodate settling and subsidence so that the cover's integrity is maintained? ___Yes___No

5. Have a permeability less than or equal to the permeability of any bottom liner system natural subsoils present? ___Yes___No

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EPA ID NUMBER: LADC084341B5

WASTE PILES CHECKLIST
(SUBPART L - WASTE PILES, 265.250)

NOTE: WASTE PILES MAY ALSO BE MANAGED AS A LANDFILL.

Protection From Wind (265.251)

1. Is the pile containing hazardous waste protected from wind? ___Yes X No

Waste Analysis (265.250)

2. For offsite facilities, is a representative sample of waste from each incoming shipment analyzed before the waste is added to the pile to determine the compatibility of the wastes? ___Yes X No

   a. For offsite facilities does the analysis include a visual comparison of color and texture? ___Yes ___No

3. Is the leachate or run-off from the pile considered a hazardous waste? ___Yes X No

   a. If yes, is the pile managed with the following?

      1. An impermeable base compatible with the waste? ___Yes ___No
      2. Run-on diversion? ___Yes ___No
      3. Leachate and run-off collection? ___Yes ___No

   OR

   b. 1. Is the pile protected from precipitation and run-on by some other means? ___Yes ___No

   AND

      2. Are liquids or wastes containing free liquids placed in the pile? ___Yes ___No

Special Requirements for Ignitable or Reactive Waste (265.256)

4. Are ignitable or reactive wastes placed in the pile? ___Yes X No

   a. If yes, are they treated, rendered or mixed before or immediately after placement in the pile so it no longer meets the definition of ignitable or reactive? (Use narrative sheet to describe procedure) ___Yes ___No

   OR

   b. Is the waste protected from sources of ignition or reaction? ___Yes ___No

1. If yes, use narrative explanations sheet to describe separation and confinement procedures.

2. If no, use narrative explanations sheet to describe source of ignition or reaction.

Special Requirements for Incompatible Waste (265.257)

5. Have incompatible wastes ever been placed together in the waste pile? ___Yes X No

If yes, what was the result?_____

_____

_____

6. Have there been other wastes previously stored at the site of the present waste pile? ___Yes___No

a. Have hazardous wastes been piled in the same area where incompatible wastes of materials were previously piled? ___Yes___No

b. If yes, was the area decontaminated? (Use narrative explanation sheet.)

Design Requirements (265.254)

7. Is the waste pile a new unit, lateral expansion of an existing unit or replacement of an existing unit? ___Yes X No

If yes,

a. Has waste been received since May 1985? ___Yes___No

If yes,

1. Is the waste pile completed with two or more liners and a leachate collection system between such liners? ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

TANKS CHECKLIST

Effective July 14, 1986

Applicability (40 CFR 265.190)

1. Are tanks used to store or treat hazardous waste? X Yes ___ No

2. Complete the following table for all tanks.

Tank Identification	Location	New or Existing Tank	Date put into Service	Wastes Handled
Sludge tank	Pond Area	Existing	Unknown	Sludge
Barge tank 1	↓	↓	1992	Oil/Sludge
Barge tank 2			1992	Oil/Sludge
Barge tank 3			1992	Oil/Sludge
Oil tank			Unknown	Oil
Asphalt tank 1			↓	Asphalt
Asphalt tank 2	↓			Asphalt
Barge tank 4	Barge Slip	↓	↓	Oil/Sludge

Existing Tank System (40 CFR 265.191)

1. Were any hazardous waste storage or treatment tanks constructed or put into service after July 14, 1986? X Yes ___ No

   If yes, complete 'New Tank System'.

   If no, continue.

2. Has the existing tank system's integrity been reviewed and certified by an independent, qualified registered professional engineer? ___ Yes X No

   If yes,

   a. Did the assessment determine that the tank system is adequately designed (i.e. has sufficient structural strength and is compatible with the wastes to ensure that it will not collapse, rupture, or fail)? ___ Yes ___ No

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If yes, did it include:

a. Design standard(s) according to which the tank and ancillary equipment were constructed? ___Yes ___No

b. Hazardous characteristics of the waste(s) that have been and will be handled? ___Yes ___No

c. Existing corrosion protection measures? ___Yes ___No

d. Documented or estimated protection measures? ___Yes ___No

e. Results of leak test, internal inspections or other tank integrity examinations? ___Yes ___No

3. If the tank is non-enterable, did the assessment include a leak test? X Yes ___No

If yes, did the leak test include:

a. Temperature variation? ___Yes X No

b. Tank end deflection? ___Yes X No

c. Vapor pockets? ___Yes X No

d. High water table? ___Yes X No

4. Is this written assessment kept on file at the facility? ___Yes X No

New Tank Systems (40 CFR 265.192)

1. Has the integrity of the tank system been reviewed and certified by an independent, qualified registered professional engineer? ___Yes X No

2. Does the assessment include the following information:

a. Design standards according to which tank(s) and/or ancillary equipment are constructed? ___Yes ___No

b. Hazardous characteristics of waste(s) to be handled? ___Yes ___No

c. Factors affecting potential for corrosion (for tanks in which external metal components of the tank will be in contact with soil) by a corrosion expert? ___Yes ___No

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EPA ID NUMBER: LAD008432185

Note: The factors affecting the potential for corrosion should include:

1. Soil moisture content;
2. Soil pH;
3. Soil sulfides level;
4. Soil resistivity;
5. Structure to soil potential;
6. Influence of nearby underground metal structures (e.g. piping);
7. Existence of stray electric current;
8. Existing corrosion-protection measures (e.g. coating, cathodic protection); and
9. Type and degree of external corrosion protection.

d. Was an analysis completed to determine that the underground tank system components will not be affected by vehicle traffic? ___Yes ___No

e. Was an analysis completed on the design considerations of each tank to ensure that the foundation will maintain a fully loaded tank and that system components are anchored to prevent flotation, dilodgment, or frost heave? ___Yes ___No

3. Prior to covering the tank system, did an independent, qualified registered professional engineer inspect the tanks for the following:

a. weld breaks? ___Yes X No

b. punctures? ___Yes X No

c. scrapes of protective coating? ___Yes X No

d. cracks? ___Yes X No

e. corrosion? ___Yes X No

f. other structural damage or inadequate construction/installation? ___Yes X No

4. Were any components of the tank placed underground? X Yes ___No

If yes,

a. Was backfill material a non-corrosive, porous, homogeneous substance that has been installed and compacted to ensure hat the tank and piping are supported? ___Yes X No

5. Was the tank and ancillary equipment tested for tightness prior to being covered, enclosed, or placed in use? X Yes ___No

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EPA ID NUMBER: LAD008434185

Containment and Detection of Releases (40 CFR 265.193)

Note: For existing tanks storing F020-F023, F026-F027 (Dioxin Wastes), secondary containment is required within 2 years after January 12, 1987. For all other existing tank systems secondary containment systems are required by January 12, 1989 or 15 years from the date the tank was installed, whichever comes later.

1. Are any tanks sistuated inside a building with an impermeable floor? ___Yes X No

   If yes,

   a. Do these tanks contain hazardous waste with free liquids (265.190(a))? ___Yes ___No

   b. Was the Paint Filter Liquid Test used to demonstrate the absence or presence of free liquids (265.190(a))? ___Yes ___No

2. Are any tanks part of a secondary containment system used to collect or contain releases of hazardous wastes? ___Yes X No

   Note: If #1 or #2 are yes, then 265.193 of this checklist is not applicable for these tanks.

3. Does the tank have a secondary containment system? ___Yes X No

4. Is the secondary containment system constructed of or lined with materials compatible with the wastes? ___Yes ___No

5. Does the secondary containment system have a leak-detection system? ___Yes ___No

   If yes,

   a. Is the leak-detection system capable of detecting failure of the secondary containment or presence of releases of hazardous wastes within 24 hours? ___Yes ___No

6. Is the secondary containment system sloped and designed to drain and remove liquids resulting from leaks, spills, or precipitation? ___Yes ___No

   a. Are spills removed from the secondary containment system within 24 hours? ___Yes ___No

7. If the answer to #3 and #4 is no, was the Regional Administrator notified that spill clean-up can not be accomplished within 24 hours? ___Yes X No

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EPA ID NUMBER: LAD008434185

8. Does the secondary containment system include one (or more) of the following devices: ___Yes___No

a. Liner (External to the tank)? ___Yes___No

If yes, is it:

i. Designed or operated to contain 100 percent of the capacity of the largest tank? ___Yes___No

ii. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system (unless the collection system is sufficient)? ___Yes___No

iii. Free of cracks or gaps? ___Yes___No

iv. Designed and installed to completely surround the tank and to cover all surrounding earth likely to come in contact with the waste (if released)? ___Yes___No

b. Vault? ___Yes___No

If yes, is it:

i. Designed or operated to contain 100 percent of the capacity of the largest tank? ___Yes___No

ii. Designed or operated to prevent run-on or infiltration of precipitation into the secondary containment system (unless the collection system is sufficient)? ___Yes___No

iii. Constructed with chemical-resistant water stops in place at all joints (if any)? ___Yes___No

iv. Provided with an impermeable interior coating or lining that is compatible with the stored waste? ___Yes___No

v. Provided with a means to protect against the formation of an ignition of vapors within the vault? ___Yes___No

c. Double-walled tank? ___Yes___No

If yes, is it:

i. Designed as in integral structure so that any release from the inner tank is contained by the outer shell? ___Yes___No

ii. Protected (if constructed with metal) from both corrosion of the primary tank interior and the external surface of the outer shell? ___Yes ___No

iii. Provided with a built-in leak detection system capable of detecting a release within 24 hours or earliest practical time? ___Yes ___No

d. An equivalent device approved by the Regional Administrator? ___Yes ___No

9. Is the ancillary equipment provided with a secondary containment system (e.g. trench, jacketing, double-walled piping)? ___Yes X No

10. Has the owner/operator obtained a secondary containment variance from the Regional Administrator? ___Yes X No

General Operating Requirements (40 CFR 265.194)

1. Is there evidence that hazardous waste has caused a tank or ancillary equipment to rupture, corrode, or cause leakage of the tank or ancillary equipment? ___Yes X No

2. Does the owner/operator use appropriate controls and practices to prevent spills and overflows from the tank or secondary containment system (i.e. spill prevention controls, maintenance of freeboard)? ___Yes X No

Inspections (40 CFR 265.195)

1. Does the owner/operator inspector the following at least daily:

a. Overfill/spill control equipment? X Yes ___No

b. Aboveground portions of tank system (if applicable) to detect corrosion or releases of waste? ___Yes X No

c. Data gathered from monitoring and leak detection equipment to ensure that the tank is being operated according to design? ___Yes X No

d. Construction materials and the area immediately surrounding the external accessible portions of tank system? ___Yes X No

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EPA ID NUMBER: LAD006434185

2. Have cathodic protection systems been inspected and confirmed to be working properly within 6 months after initial installation and annually thereafter? ___Yes ___No N/A

3. Are all sources of impressed current inspected and/or tested at least bimonthly? ___Yes ___No N/A

4. Is this information documented in the operating record? ___Yes X No

Response to Leaks/Spills and Disposition of Leaking or Unfit for Use Tank Systems (40 CFR 265.196)

1. Have any tank systems or secondary containment systems had a leak or spill, or been determined to be unfit for use? X Yes ___No

   If no, go to Closure Section of this checklist.

   If yes,

   a. Was the flow restricted from entering the tank system or secondary containment system? ___Yes X No

   b. Was a visual inspection conducted and were measures taken to prevent further migration of the leak or spill onto soil/surface water? ___Yes X No

   c. What was the type and quantity of waste spilled? Unknown ___Yes ___No

   d. Was the spill contained and cleaned immediately? ___Yes X No

2. Were all spills of greater than one pound of hazardous waste which were not immediately contained and cleaned up reported to the Regional Administrator within 24 hours? ___Yes X No

3. Have there been any releases to the environment? X Yes ___No

   If yes,

   a. Has the owner/operator made the appropriate report to the Regional Administrator? ___Yes X No

4. Was the release to the environment from a component of a tank system which had no secondary containment? X Yes ___No

   If yes,

   a. Was secondary containment provided prior to returning that component to service? ___Yes X No

5. Has the owner/operator made extensive repairs to the tank system? ___Yes X No

If yes,

a. Has a certification from an independent, qualified registered professional engineer stating that the repaired system is capable of handling hazardous wastes without releases for the intended life of the system? ___Yes ___No

b. Has this certification been sent to the Regional Administrator within 7 days after returning the tank system to use? ___Yes ___No

Closure and Post-Closure Care (40 CFR 265.197)

1. Does the closure plan address the closure of all tanks and ancillary equipment? No Closure Plan ___Yes ___No

[In addition, the Closure Checklist must be completed]

Special Requirements for Ignitable or Reactive Wastes (40 CFR 265.198)

1. Have ignitable or reactive wastes been placed in tank systems? ___Yes X No

If yes,

a. Has the waste been treated, rendered, or mixed before or immediately after placement in tank systems to no longer meet the definition of ignitable or reactive waste? ___Yes ___No

OR

b. Has the waste been stored or treated such that it is protected from any material or condition that might cause it to ignite? ___Yes ___No

OR

c. Is the tank used solely for emergencies? ___Yes ___No

d. Does the tank meet the distance requirements from public ways (streets, alleys, adjoining property line) according to the chart in Table 2-1 through 2-6 of the National Fire Protection Association? ___Yes ___No

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EPA ID NUMBER: LAD008434185

Special Requirements for Incompatible Wastes (40 CFR 265.199)

1. Are incompatible wastes placed in tank systems? ___Yes X No

   If yes,

   a. Are wastes handled in such a way as to generate extreme heat, pressure, fire, explosion, violent reaction or any means to threaten human health or the environment? ___Yes ___No

2. Has the tank been decontaminated prior to placing an incompatible waste in it? ___Yes ___No

Waste Analysis and Trial Tests (40 CFR 265.200)

1. Does the owner/operator conduct waste analyses and trial treatment or storage tests when the tank system is used to store or treat a hazardous waste which differs from the previous waste? ___Yes X No

2. Did the owner/operator obtain written, documented information on similar waste under similar operating conditions to show that the proposed treatment or storage will meet general operating requirements? ___Yes X No

Small Quantity Generators (SQG) (40 CFR 265.201)

1. Does the owner/operator generate between 100 and 1000 kg of hazardous waste per month? Unknown ___Yes ___No

   If no, do not complete this section.

   If yes,

   a. Does the operator take precautions to prevent accidental ignition or reactions of ignitable or reactive wastes? ___Yes ___No N/A

   b. Have hazardous wastes or treatment reagents caused the tanks or inner liner to rupture, leak, or corrode? Unknown ___Yes ___No

   c. Does the tank have at least 60 cm of freeboard, unless the tank is equipped with a containment structure? ___Yes X No

   d. Are wastes stored in tanks greater that 180 days? X Yes ___No

If yes,

i. Is the disposal site greater than 200 miles? ___Yes X No

If no,

ii. Has the owner/operator applied for interim status? ___Yes X No

e. Are wastes stored in tanks greater than 270 days? X Yes ___No

If yes,

i. Has the owner/operator applied for interim status? ___Yes X No

f. Does the tank have an automatic waste feed cutoff system or stand-by tank to stop inflow? ___Yes X No

g. Does the generator inspect the tanks for the following conditions: ___Yes ___No

i. discharge control equipment? ___Yes ___No

ii. data gathered from monitoring equipment at least once each operating day to ensure that the tank is being operated according to design? ___Yes X No

iii. Level of waste in tank? X Yes ___No

h. Construction materials and immediate surrounding area to detect leaks? ___Yes X No

2. Are reactive or ignitable wastes being stored in tanks? ___Yes X No

If yes, complete Special Requirements for Ignitable or Reactive Wastes Section of this checklist.

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LAND DISPOSAL RESTRICTIONS CHECKLIST

Form A - Restricted Waste Determination

Note: This form must be completed during all RCRA Compliance Evaluation Inspections (CEIs). Additional forms (B through F) may be required depending on the types of wastes generated or handled.

Section I. Wastes restricted on November 7, 1986 (F-solvents and Dioxins)

Check each box that applies (see Appendix A):

X F001	___ F002	___ F003*	___ F004	___ F005
___ F020	___ F021	___ F022	___ F023	___ F026
___ F027	___ F028			

___ None of the wastes listed above are handled by the generator. Complete Section II of this form.

X One or more of the wastes listed above are handled by the generator. Complete Form C- Manifesting Restricted Wastes and Form D- Testing and Management of F-solvents and Dioxins.

* Applicable only if waste is ignitable.

Section II. Wastes restricted on July 8, 1987 (California List)

Check each box that applies:

___ Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentrations greater than 1000 mg/L.

___ Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:

- ___ Arsenic or compounds containing arsenic greater than 500 mg/L;
- ___ Cadmium or compounds containing cadmium greater than 100 mg/L;
- ___ Chromium or compounds containing chromium greater than 500 mg/L;
- ___ Lead or compounds containing lead greater than 500 mg/L;
- ___ Mercury or compounds containing mercury greater than 20 mg/L;
- ___ Nickel or compound containing nickel greater than 134 mg/L;

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Form A - Restricted Waste Determination (cont'd)

___ Selenium or compounds containing selenium greater than 100 mg/L;
___ Thallium or compounds containing thallium greater than 130 mg/L.

___ Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.

___ Liquid hazardous wastes that also contain polychlorinated biphenyls (PCBs) at concentrations between 50 to 500 mg/L.

___ Liquid or non-liquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/kg.

X None of the wastes listed above are handled by the generator.
Complete Section III of this form.

___ One or more of the wastes listed above are handled by the generator.
Complete Form C - Manifesting Restricted Wastes, and Form E - Testing and Management of California List Wastes.

Note: The treatment standards for some of the California Listed Wastes may have been superseded with treatment standards for the Third Thirds Characteristic Wastes.

Section III. Wastes restricted on August 8, 1988 (First Third List)

1. Hard Hammer Wastes (see appendix B)

___ F006	___ K001	___ K004	___ K008	___ K015
___ K016	___ K018	___ K019	___ K020	___ K021
___ K022	___ K024	___ K025	___ K030	___ K036
___ K037	___ K044	___ K045	___ K046	___ K047
___ K048	___ K049	___ K050	___ K051	___ K052
___ K060	___ K061	___ K062	___ K069	___ K071
___ K083	___ K086	___ K087	___ K099	___ K100
___ K101	___ K102	___ K103	___ K104	

FACILITY NAME: SBA Shipyards

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Form A - Restricted Waste Determination (cont'd)

2. Soft Hammer Wastes (see Appendix C)

A. Wastewaters only

___ F006	___ K004	___ K008	___ K021	___ K022
___ K025	___ K036	___ K046	___ K060	___ K061
___ K069	___ K083	___ K086	___ K100	___ K101
___ K102				

B. All others

___ F007	___ F008	___ F009	___ F019	___ K011
___ K013	___ K014	___ K017	___ K031	___ K035
___ K036	___ K069	___ K073	___ K083	___ K084
___ K085	___ K086	___ K101*	___ K102*	___ K106
___ P001	___ P004	___ P005	___ P010	___ P011
___ P012	___ P015	___ P016	___ P018	___ P020
___ P030	___ P036	___ P037	___ P039	___ P041
___ P048	___ P050	___ P058	___ P059	___ P063
___ P068	___ P069	___ P070	___ P071	___ P081
___ P082	___ P084	___ P087	___ P089	___ P092
___ P094	___ P097	___ P102	___ P105	___ P108
___ P110	___ P115	___ P120	___ P122	___ P123
___ U007	___ U009	___ U010	___ U012	___ U016
___ U018	___ U019	___ U022	___ U029	___ U031
___ U036	___ U037	___ U041	___ U043	___ U044
___ U046	___ U050	___ U051	___ U053	___ U061
___ U063	___ U064	___ U066	___ U067	___ U074
___ U077	___ U078	___ U086	___ U089	___ U103
___ U105	___ U108	___ U115	___ U122	___ U124
___ U129	___ U130	___ U133	___ U134	___ U137
___ U151	___ U154	___ U155	___ U157	___ U158
___ U159	___ U171	___ U177	___ U180	___ U185
___ U188	___ U192	___ U200	___ U209	___ U210
___ U211	___ U219	___ U220	___ U221	___ U223
___ U226	___ U227	___ U228	___ U237	___ U238
___ U248	___ U249			

* Nonwastewaters with greater than 1% As.

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Form A - Restricted Waste Determination (cont'd)

X None of the wastes listed above are handled by the generator. Complete Section IV of this form.

___ One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form F - Testing and Management of First Third, Second Third, and Third Third List Wastes.

Section IV. Wastes restricted on June 8, 1989 (Second Third)

1. Hard Hammer Wastes

___ F007	___ F008	___ F009	___ F010	___ F011
___ F012	___ F024	___ P013	___ P021	___ P029
___ P030	___ P039	___ P040	___ P041	___ P043
___ P044	___ P062	___ P063	___ P071	___ P073
___ P074	___ P085	___ P089	___ P094	___ P097
___ P098	___ P099	___ P104	___ P106	___ P109
___ P111	___ P121	___ K005	___ K007	___ K009
___ K010	___ K011	___ K013	___ K014	___ K023
___ K027	___ K028	___ K029*	___ K036	___ K038
___ K039	___ K040	___ K043	___ K093	___ K094
___ K095*	___ K096	___ K113	___ K114	___ K115
___ K116	___ U028	___ U058	___ U069	___ U087
___ U088	___ U102	___ U107	___ U109	___ U221
___ U223	___ U235			

* Nonwastewater only

2. Soft Hammer Wastes

A. Wastewaters only

___ K025	___ K029	___ K095	___ K096

B. All others

___ K041	___ K042	___ K097	___ K098	___ K105
___ P002	___ P003	___ P007	___ P008	___ P014

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Form A - Restricted Waste Determination (cont'd)

___ P026	___ P049	___ P054	___ P057	___ P060
___ P066	___ P067	___ P072	___ P107	___ P112
___ P113	___ P114	___ U002	___ U003	___ U005
___ U008	___ U011	___ U014	___ U015	___ U020
___ U021	___ U023	___ U026	___ U032	___ U035
___ U047	___ U049	___ U057	___ U059	___ U060
___ U062	___ U070	___ U073	___ U080	___ U083
___ U092	___ U093	___ U094	___ U095	___ U097
___ U098	___ U099	___ U101	___ U106	___ U109
___ U110	___ U111	___ U114	___ U116	___ U119
___ U127	___ U128	___ U131	___ U135	___ U138
___ U140	___ U142	___ U143	___ U144	___ U146
___ U147	___ U149	___ U150	___ U161	___ U162
___ U163	___ U164	___ U165	___ U168	___ U169
___ U170	___ U172	___ U173	___ U174	___ U176
___ U178	___ U179	___ U189	___ U193	___ U196
___ U203	___ U205	___ U206	___ U208	___ U213
___ U214	___ U215	___ U216	___ U217	___ U218
___ U239	___ U244			

X None of the wastes listed above are handled by the generator. Complete Section V of this form.

___ One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form F - Testing and Management of First Third, Second Third, and Third Third List Wastes.

Section V. Wastes restricted on May 8, 1990 (Last Third)

Note: These wastes were prohibited from land disposal on August 8, 1990 or subject to a 3 month national capacity variance.

1. Hard Hammer Wastes

___ D001	___ D002	___ D003	___ D004	___ D005
___ D006	___ D007	___ D008	___ D009	___ D010
___ D011	___ D012	___ D013	___ D014	___ D015
___ D016	___ D017			

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Form A - Restricted Waste Determination (cont'd)

X F001	___ F002	___ F003	___ F004	___ F005
___ F006	___ F007	___ F008	___ F009	___ F010
___ F011	___ F012	___ F019	___ F024	___ F025
___ F039*@	___ K001	___ K002	___ K003	___ K004
___ K005	___ K006	___ K007	___ K008	___ K011
___ K013	___ K014	___ K015	___ K017	___ K021
___ K022	___ K025	___ K026	___ K028	___ K029
___ K031	___ K032	___ K033	___ K034	___ K035
___ K041	___ K042	___ K046	___ K048	___ K049
___ K050	___ K051	___ K052	___ K060	___ K061*
___ K062	___ K069**	___ K071@	___ K073	___ K083
___ K084	___ K085	___ K086	___ K087	___ K095
___ K096	___ K097	___ K098	___ K100	___ K101
___ K102	___ K105	___ K106@	___ P001	___ P002
___ P003	___ P004	___ P005	___ P006	___ P007
___ P008	___ P009	___ P010	___ P011	___ P012
___ P013	___ P014	___ P015	___ P016	___ P017
___ P018	___ P020	___ P022	___ P023	___ P024
___ P027	___ P028	___ P031	___ P033	___ P034
___ P035	___ P038	___ P042	___ P045	___ P046
___ P047	___ P048	___ P049	___ P050	___ P051
___ P054	___ P056	___ P057	___ P058	___ P059
___ P060	___ P064	___ P065@	___ P066	___ P067
___ P068	___ P069	___ P070	___ P072	___ P073
___ P074	___ P075	___ P076	___ P077	___ P078
___ P081	___ P082	___ P084	___ P088	___ P092@
___ P093	___ P095	___ P096	___ P099	___ P101
___ P102	___ P103	___ P104	___ P105	___ P108
___ P109	___ P110	___ P112	___ P113	___ P114
___ P115	___ P116	___ P118	___ P119	___ P120
___ P122	___ P123	___ U001	___ U002	___ U003
___ U004	___ U005	___ U006	___ U007	___ U008
___ U009	___ U010	___ U011	___ U012	___ U014
___ U015	___ U016	___ U017	___ U018	___ U019
___ U020	___ U021	___ U022	___ U023	___ U024

*@ New waste code for multi-source leachate.

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Form A - Restricted Waste Determination (cont'd)

___ U025	___ U026	___ U027	___ U029	___ U030
___ U031	___ U032	___ U033	___ U034	___ U035
___ U036	___ U037	___ U038	___ U039	___ U041
___ U042	___ U043	___ U044	___ U045	___ U046
___ U047	___ U048	___ U049	___ U050	___ U051
___ U052	___ U053	___ U055	___ U056	___ U057
___ U059	___ U060	___ U061	___ U062	___ U063
___ U064	___ U066	___ U067	___ U068	___ U070
___ U071	___ U072	___ U073	___ U074	___ U075
___ U076	___ U077	___ U078	___ U079	___ U080
___ U081	___ U082	___ U083	___ U084	___ U085
___ U086	___ U089	___ U090	___ U091	___ U092
___ U093	___ U094	___ U095	___ U096	___ U097
___ U098	___ U099	___ U101	___ U103	___ U105
___ U106	___ U108	___ U109	___ U110	___ U111
___ U112	___ U113	___ U114	___ U115	___ U116
___ U117	___ U118	___ U119	___ U120	___ U121
___ U122	___ U123	___ U124	___ U125	___ U126
___ U127	___ U128	___ U129	___ U130	___ U131
___ U132	___ U133	___ U134	___ U135	___ U136
___ U137	___ U138	___ U140	___ U141	___ U142
___ U143	___ U144	___ U145	___ U146	___ U147
___ U148	___ U149	___ U150	___ U151@	___ U152
___ U153	___ U154	___ U155	___ U156	___ U157
___ U158	___ U159	___ U160	___ U161	___ U161
___ U162	___ U163	___ U164	___ U165	___ U166
___ U167	___ U168	___ U169	___ U170	___ U171
___ U172	___ U173	___ U174	___ U175	___ U176
___ U177	___ U178	___ U179	___ U180	___ U181
___ U182	___ U183	___ U184	___ U185	___ U186
___ U187	___ U188	___ U189	___ U190	___ U191
___ U192	___ U193	___ U194	___ U196	___ U197
___ U200	___ U201	___ U202	___ U203	___ U204
___ U205	___ U206	___ U207	___ U208	___ U209
___ U210	___ U211	___ U213	___ U214	___ U215
___ U216	___ U217	___ U218	___ U219	___ U220
___ U222	___ U225	___ U226	___ U227	___ U228

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Form A - Restricted Waste Determination (cont'd)

__ U234	__ U236	__ U237	__ U238	__ U239
__ U240	__ U243	__ U244	__ U246	__ U247
__ U248	__ U249			

* Low Zinc Subcategory
** Calcium Sulfate Subcategory
@ Low Mercury Subcategory

__ None of the wastes listed above are handled by the generator. Complete Section VI of this form.

X One or more of the wastes listed above are handled by the generator. Complete Form C - Manifesting Restricted Wastes and Form F - Testing and Management of First Third, Second Third, and Third Third List Wastes.

Section VI. BDAT Treatability Group - Treatment Standards Identification.

1. Does the generator mix restricted wastes which have different treatment standards? X Yes __ No

   If yes,

   A. Did the generator select the most stringent treatment standard? __ Yes X No

Section VII. Characteristic Wastes.

Note: This Section applies to those wastes that are listed under 40 CFR 261, Subpart D and also exhibit a characteristic of a hazardous waste under 40 CFR 261, Subpart C.

1. Does the facility generate hazardous wastes listed under 40 CFR 261 Subpart D that also exhibit the characteristic of a hazardous waste under 40 CFR 261, Subpart C. __ Yes X No

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2. List these wastes:

_____

_____

_____

_____

_____

_____

_____

3. Has the generator determined if the treatment standards for listed wastes includes a treatment standard for the constituent that caused the waste to exhibit the characteristic. ___Yes _X_No

4. Were the most stringent treatment standards selected? ___Yes _X_No

5. Were characteristic wastes that have been treated and no longer meet the characteristic disposed of in a subtitle D (solid waste disposal) facility? ___Yes _X_No

If yes,

A. Did the generator or treatment facility send the Regional administrator a certification to that effect? ___Yes ___No

6. Did the certification include the following information:

A. The name and address of the Subtitle D facility receiving the waste? ___Yes ___No

B. A description of the waste as originally generated, including the applicable EPA hazardous waste number and the treatability group? ___Yes ___No

C. The treatment standards applicable to the waste at the initial point of generation? ___Yes ___No

D. The signature of a duly authorized representative and the appropriate language found in 268.7 (b)(5)(i)? ___Yes ___No

7. Does the generator treat prohibited wastes in less than 90 day accumulation tanks or containers? (If yes, complete Form G) ___Yes _X_No

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LAND DISPOSAL RESTRICTION CHECKLIST

Form B - Treatment, Storage, and Disposal

Note: This form should be completed only if the generator or handler stores restricted wastes on-site for greater than 90 days or operates RCRA-regulated treatment or disposal units. Small quantity generators who accumulate restricted wastes for less than 180 (270) days are exempt from the following requirements.

Section I. General facility standards

1. Has the facility's waste analysis plan been revised in accordance with 264.13(b)(6) or 265.13(b)(6) to reflect requirements under 268.7? ___Yes X No

2. Has the facility obtained representative chemical and physical analysis of wastes and residues in accordance to 264.13 or 265.13? ___Yes X No

   If yes,

   A. Chemical and physical analyses of F-solvents and Dioxins

      i. Has testing included analyses for all F-solvent constituents? ___Yes___No

      ii. Were all f-solvent constituents analyzed by employing the Toxicity Characteristic Leaching Procedure (TCLP)? ___Yes___No

   B. Chemical and physical analyses of California List Wastes

      i. Were the following analyses conducted on California List Wastes:

         a. pH? ___Yes___No

         b. Concentrations of PCBs? ___Yes___No

         c. Concentrations of Halogenated Organic Compounds? ___Yes___No

         d. Heavy Metal concentration? ___Yes___No

         e. Cyanide concentration? ___Yes___No

   C. Chemical and physical analyses of First Third, Second, Third, and Third Third List Wastes

      i. Has the facility tested wastes with established treatment standards (hard hammer wastes)? ___Yes___No

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If yes,

a. List these wastes and the test procedures used determine concentrations below:

_____

_____

_____

3. Were these analyses conducted on-site or off-site? OFF-SITE

A. If off-site, identify lab: James Laboratories, Lafayette, LA

4. Describe the frequency of sampling restricted wastes below: No established frequency

_____

Attach copy of most recent waste analysis.

Section II. Storage of Restricted Wastes

1. Have Restricted wastes exceeding treatment standards been stored? X Yes ___ No

If yes,

A. Have all containers been clearly marked to identify contents and date(s) entering storage? ___ Yes X No

B. Do operating records track location, quantity, and dates that restricted wastes entered and were removed from storage? ___ Yes X No

C. Do records agree with container labeling? ___ Yes X No

D. Are restricted wastes stored for less than 1 year? ___ Yes X No

E. Have tanks been emptied at least once per year, and do operating records show that volumes of restricted wastes removed from tanks at least equal tank volume? ___ Yes X No

F. Have restricted wastes been stored for more than one year? X Yes ___ No

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i. If yes, can the owner/operator demonstrate that the purpose of such storage has been solely conducted for accumulating sufficient quantities restricted wastes to facilitate proper recovery, treatment, or disposal? ___Yes X No

Section III. Storage or treatment in surface impoundments

1. Have restricted wastes exceeding treatment standards been placed in surface impoundments? X Yes ___No

   A. If yes, have these wastes and their residues been removed at least annually? ___Yes X No

   B. If no, skip the remainder of this section.

2. Have these wastes been placed for treatment? ___Yes ___No

   A. If yes, describe treatment processes below:

   _____

   _____

   _____

3. Is the only recognizable "treatment " occurring in the impoundment either evaporation, dilution, or both? ___Yes ___No

4. Did the facility submit the following to the Agency?

   A. A certification of compliance with minimum technology requirements? ___Yes ___No

   B. A certification of compliance with groundwater monitoring requirements? ___Yes ___No

   C. A copy of the waste analysis plan? ___Yes ___No

   D. A certification as to the accuracy of the information? ___Yes ___No

5. Have minimum technology requirements been met? ___Yes ___No

   A. If no, have waivers been granted for each restricted waste management unit? ___Yes ___No

6. Have all 264/265 Subpart F groundwater monitoring requirements been met? ___Yes ___No

7. Have representative samples of sludge and supernatant from applicable surface impoundments been tested adequately and in accordance with sampling frequency and analysis specified in the waste analysis plan? ___Yes ___No

FACILITY NAME: SBA Shipyards

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A. Are test results maintained in the operating record? ___Yes___No

B. Did hazardous waste residues (i.e. sludge or liquid) exceed treatment standards as specified in 268.41? ___Yes___No

C. Provide the frequency of analyses conducted on treatment residues below:

_____

_____

_____

D. Do operating records adequately document results of waste analyses performed in accordance with 268.41? ___Yes___No

8. Has supernatant been determined to exceed treatment standards? ___Yes___No

A. If yes, is annual throughput greater than surface impoundment volume? ___Yes___No

9. If residues were remove annually, have adequate precautions been taken to protect liners and do records indicate that inspections of liner integrity are performed? ___Yes___No

10. When removed, were solvent wastes managed subsequently in another surface impoundment? ___Yes___No

11. When removed, were wastes treated prior to disposal? ___Yes___No

A. If yes, are waste residues treated on-site or off-site? _____

B. Describe management method below:

_____

_____

_____

_____

Section IV. RCRA-Regulated Waste Treatment (not including surface impoundments)

1. Did the facility operate treatment facilities for restricted wastes? X Yes___No

If no, skip the rest of Section IV.

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2. Describe processes used to handle residuals generated?
Hazardous sludges were at one time stabilized with lime and fly ash and land treated. Residues are still on the ground

3. Does the treatment facility test the treatment residuals in accordance with an acceptable waste analysis plan? ___Yes X No

4. Do treatment residuals exceed treatment standards? ___Yes X No

If yes,

A. Describe processes used to handle those residuals?

B. Describe the frequency of testing of treatment residuals?

5. Was dilution used as a substitute for adequate treatment? Possibly X Yes ___No

A. If yes, explain dilution procedure in detail?
Sludges mixed with large volumes of lime and fly ash. No control regarding whether this diluted or stabilized the hazardous waste

Note: See Attachment A for dilution flowchart.

If any treatment residuals were shipped off-site for further treatment or disposal, complete Form C - Manifesting Restricted Wastes.

6. Are certification and results of waste analyses kept in the operating record? ___Yes X No

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EPA ID NUMBER: LAD008434185

Section V. Land Disposal

1. Were restricted wastes placed in land disposal units (i.e.surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers) for other than treatment purposes? ___Yes X No Although possibly for long-term storage

2. Has the facility disposed of any wastes that are recyclable material used in a manner constituting disposal? ___Yes X No

3. Did the facility have appropriate notices or certifications from generators or treatment facilities in its operating record [268.7(a-b)]? ___Yes ___No

4. Did the facility obtain waste analyses of restricted wastes to determine if such wastes were in compliance with applicable treatment standards [268.7(c)]? ___Yes X No

5. Were restricted wastes exceeding the applicable treatment standards or prohibition levels placed in land disposal units excluding national capacity variance? X Yes ___No

   If yes,

   A. Did the facility have an approved waiver based on "no migration" petition, approved case-by-case, capacity extension, or treatment standard variance? ___Yes X No

   B. What was the date of approval? _____

6. Were restricted wastes, subject to national or case-by-case capacity variances or extensions, disposed? ___Yes X No

   If yes,

   A. Were these wastes disposed of in a hazardous waste management unit that meets minimum technology requirements? ___Yes ___No

7. Are adequate records of disposal maintained? ___Yes X No

8. If wastes subject to nationwide variances, case-by-case extensions, or no migration petitions were disposed, does the facility have notices and records of disposal? ___Yes ___No

9. If the facility has a case-by-case extension, is there data available to verify that the facility is making progress as described in progress reports? ___Yes ___No

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10. If the facility disposed of a soft hammer waste, are notices or certifications maintained on-site? ___Yes___No

If yes,

A. Could any of these wastes be classified as California List wastes? ___Yes___No

B. Did the facility seek to verify whether these wastes are subject to all restrictions? ___Yes___No

11. Are restricted wastes disposed of by injection into underground injection wells? ___Yes X No

If yes,

A. Has a "no migration" petition been granted by EPA? ___Yes___No

B. If yes, Give date of petition approval? _____

Note: Attachment B lists the effective dates for the underground injection ban for hazardous wastes.

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LAND DISPOSAL RESTRICTIONS CHECKLIST

Form C - Manifesting Restricted Wastes

Note: This form should be completed only if the generator or handler ships restricted waste off-site for treatment or disposal. The following requirements may also apply to treatment facilities (including incinerators) which ship residues, still bottoms, or ash off-site for additional treatment or disposal.

1. If restricted wastes which exceed treatment standards, and are not subject to case-by-case extensions, "no migration" exemption, or nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

   A. Manifest document number? ___Yes___No

   B. EPA waste identification code? ___Yes___No

   C. Treatment standards for each restricted waste? ___Yes___No

      i. If the treatment standard was listed by reference, did the notification include the following:

         a. Subcategory of the waste? ___Yes___No

         b. The treatability group? ___Yes___No

         c. 40 CFR sections and paragraphs where applicable standards appear? ___Yes___No

   Note: Treatment standards for F001-F005, F039 and California List "Halogenated Organic Compounds" cannot be listed by reference.

   D. Waste analysis data (if available)? ___Yes___No

   E. All applicable restrictions? ___Yes___No

2. Identify all off-site treatment facilities accepting wastes exceeding treatment standards?

   _____

   _____

   _____

   A. What treatment processes were used?

   _____

   _____

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3. If restricted wastes do not exceed treatment standards, are subject to case-by-case extension, have a "no migration" exemption, or a nationwide variance, did the generator or handler provide the following information along with each hazardous waste manifest during shipment:

A. Manifest document number? ___Yes___No

B. EPA waste identification code? ___Yes___No

C. Treatment standards for each restricted waste? ___Yes___No

i. If the treatment standard was listed by reference, did the notification include the following:

a. Subcategory of the waste? ___Yes___No

b. The treatability group? ___Yes___No

c. 40 CFR sections and paragraphs where applicable standards appear? ___Yes___No

Note: Treatment standards for F001-F005, F039 and California List "Halogenated Organic Compounds" cannot be listed by reference.

D. Waste analysis data (if available)? ___Yes___No

E. All applicable restrictions? ___Yes___No

F. Date the wastes are subject to restriction? ___Yes___No

G. The following certification? ___Yes___No

I certify under penalty of law that I personally have been examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility to imprisonment.

Note: The above certification statement must be signed by an authorized representative of the facility.

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD 008434155

4. Identify all off-site treatment or disposal facilities accepting wastes below treatment standards:
None

A. What treatment processes were used?

5. If waste is subject to a nationwide variance, extension or petition has the facility provided notice to disposers that waste is exempt from land disposal restrictions? ___Yes___No

6. Does the generator or handler keep records of all notifications or certifications for waste sent to off-site facilities after August 7, 1988? ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD005434185

LAND DISPOSAL RESTRICTIONS CHECKLIST

Form D - Testing and Management of F-solvents and Dioxins

Note: This form should be completed only if the facility generates or handles F-solvents or Dioxin wastes regardless of concentrations.

1. Has the facility correctly determined the appropriate treatability group [268.41] for F-solvents generated or handled on-site (see Appendix A). ___Yes X No

2. Has the facility determined whether F-solvent wastes exceed treatment standards based on the following:

   A. Knowledge of process? ___Yes X No

      i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

      _____

      _____

      _____

      _____

   B. Toxicity Characteristic Leaching Process (TCLP)? X Yes ___No

      i. If yes, provide the following information:

         a. Last test date: May 1993

         b. Frequency of testing: Sludges only tested once, by LDEQ

         c. Indicate any problems with testing procedure below: No established procedures or waste analysis plan

         _____

         _____

      ii. Attach test results to report.

      iii. Were wastes tested using TCLP when processes or wastestreams changed? ___Yes ___No

FACILITY NAME: SSA Shipyards

EPA ID NUMBER: LAD008434185

iv. Was testing done prior to dilution or solidification? X Yes ___ No

C. Other (specify): ___ → by LDEQ; not by facility

3. Did F-solvent wastes exceed their applicable treatment standards upon generation [268.7(a)(2)]? ___ Yes ___ No

4. Did the facility dilute the waste or treatment residuals as a substitute for adequate treatment [268.3]? ___ Yes X No

5. Were treatment residuals generated from 264/265 RCRA-exempt units or processes? ___ Yes X No

If yes,

A. List the types(s) of treatment and unit(s) below:

Note: If the residuals from a RCRA-exempt unit are above the treatment standards, the owner/operator is considered a generator of restricted waste. The inspector should determine whether the generator requirements, particularly waste requirements, have been met for the treatment residuals.

6. Have F-solvents or dioxin wastes been stored for greater than 90 days? X Yes ___ No

If yes,

A. Is the facility operating under interim status or final permit? ___ Yes X No

If the answer was yes for either 6 or 6A, complete Form B - Treatment, Storage and Disposal.

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

LAND DISPOSAL RESTRICTIONS CHECKLIST

Form E - Testing and Management of California List Waste

Note: This form should be completed only if the facility generates or handles California List wastes at the concentrations listed in Form A-Restricted Waste Determination.

1. Has the facility conducted any testing of restricted wastes to determine whether the concentrations qualify them as California Wastes? X Yes ___ No

   If no,

   Has the facility retained records documenting that the waste is not restricted under the California List by knowledge of process? ___ Yes ___ No

2. Has the Paint Filter Liquids Test(PFLT) been performed as described by SW-846 to determine whether California List wastes (except halogenated organic compounds) are in liquid form? ___ Yes X No

3. If wastes have been determined to be in liquid form, were these wastes solidified using an absorbent? ___ Yes ___ No

   A. If yes, note type of absorbent used: _____

   B. Indicate which wastes were solidified by absorbent below:

      Check each box that applies:

      ___ Liquid hazardous wastes or liquids associated with solids or sludges containing free cyanides at concentrations greater than 1000 mg/L;

      ___ Liquid hazardous wastes or liquids associated with solids or sludges containing one or more of the following concentrations:

         ___ Arsenic or compounds containing arsenic greater than 500 mg/l;

         ___ Cadmium or compounds containing cadmium greater than 100 mg/L;

         ___ Chromium or compounds containing chromium greater than 500 mg/L;

         ___ Lead or compounds containing lead greater than 500 mg/L;

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD055434185

___Mercury or compounds containing mercury greater than 20 mg/L;

___Nickel or compounds containing nickel greater than 134 mg/L;

___Selenium or compounds containing selenium greater than 100 mg/L; or

___Thallium or compounds containing thallium greater than 130 mg/L.

___Liquid hazardous wastes exhibiting a pH less than or equal to 2.0.

___Liquid hazardous wastes that also contain polychlorinated biphenyls (PCBs) at concentrations between 50 to 500 mg/L.

___Liquid or non-liquid hazardous waste containing halogenated organic compounds at concentrations greater than or equal to 1000 mg/kg.

4. Has the facility determined whether concentration levels of the analytes (not extracts or filtrates) equal or exceed prohibition levels or whether the pH of the wastes is less than or equal to 2.0 based on:

A. Knowledge of process? ___Yes___No

i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

_____

_____

_____

B. Testing? ___Yes___No

i. Did the facility determine if concentration levels in PFLT extracts exceed cyanide or metal treatment standards? ___Yes_X_No

ii. List the test methods used:

_____

_____

_____

iii. List constituents and respective concentration levels for wastes found to exceed prohibition levels below:

_____

_____

_____

5. Has the facility treated waste on-site or off-site:
On-Site

A. If on-site, complete Form B - Treatment, Storage, and Disposal.

B. If off-site, complete Form C - Manifesting Restricted Wastes.

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

LAND DISPOSAL RESTRICTIONS CHECKLIST

Form F - Testing and Management of "First, Second and Third" Wastes

Note: This form should be completed only if the facility generates or handles wastes restricted under the "First, Second or Third Thirds" Lists.

I. Hard Hammer Provisions

1. Has the facility correctly determined the appropriate treatability group for hard hammer wastes generated or handled on-site? ___Yes X No

2. Has the facility determined whether hard hammer wastes exceed treatment standards based on the following:

   A. Knowledge of process? ___Yes ___No

      i. If facility employs knowledge of process, note adequacies or inadequacies in their methods below:

      _____

      _____

      _____

   B. Toxicity Characteristic Leaching Process (TCLP)? ___Yes X No

      i. If yes, provide the following information:

         a. Last test date:

         _____

         b. Frequency of testing:

         _____

         c. Indicate any problems with testing procedure below:

         _____

         _____

         _____

      ii. Attach test results to report.

      iii. Were wastes tested using TCLP when processes or wastestreams changed? ___Yes X No

      iv. Was testing done prior to dilution or solidification? ___Yes X No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

C. Other (specify):_____

3. Did the hard hammer wastes exceed their applicable treatment standards upon generation [268.7 (a) (2)]? ___Yes___No

4. Is there any reason to believe that the facility may have diluted these wastes to change the applicable treatment standard (based on review if process operation, pipe routing, point of sampling, etc.)? ___Yes___No

5. Did the facility ascertain whether hard hammer wastes were appropriately assigned wastewater on non-wastewater designations (wastewaters are < 1% TOC and < 1% suspended solids)? ___Yes X No

6. Does the facility handle K061 wastes? ___Yes X No

If yes,

A. Were nonwastewaters appropriately classified in either the high or low zinc subcategories (<15% Zn)? (Circle the appropriate category) ___Yes___No

7. Does the facility handle K101 or K102 wastes? ___Yes X No

If yes,

A. Were nonwastewaters appropriately classified in either the high or low arsenic subcategories? ___Yes___No

8. Have hard hammer wastes been stored for greater than 90 days? X Yes___No

If yes,

A. Is facility operating under interim status or final permit? ___Yes X No

If the answer was yes for either 8 or 8A, complete Form B- Treatment, Storage and Disposal.

II. Soft Hammer Provisions

1. Has the facility submitted demonstrations and certifications for each soft hammer waste destined for disposal in landfills or surface impoundments to the Regional Administrator prior to the shipment of the waste to the disposal facility? ___Yes X No

If yes,

i. Has the facility retained a copy of each demonstration on-site? ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

ii. Has the facility sent copies and kept copies of the following information with each shipment of soft hammer wastes: ___Yes ___No

2. Has the facility sent copies and kept copies of the following information with each shipment of soft hammer wastes:

A. Manifest document number? ___Yes ___No

B. EPA waste identification code? ___Yes ___No

C. All applicable restrictions? ___Yes ___No

D. Waste analysis data (if available) ___Yes ___No

E. Applicable certifications? ___Yes ___No

3. Do facility records indicate that soft hammer wastes are destined for disposal in landfills or surface impoundments? ___Yes ___No

If yes,

A. List the name of the waste(s) destined for disposal:

_____

_____

_____

B. Name the facility where the waste is destined:

_____

_____

4. Have soft hammer wastes been stored for greater than 90 days? X Yes ___No

A. If yes, is facility operating under interim status or final permit? ___Yes X No

If the answer was yes for either 4 or 4A, complete Form B - Treatment, Storage and Disposal.

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

Form G - Generators that Treat Prohibited Wastes

Note: This form is to be completed for those generators who treat prohibited wastes in less than 90 day accumulation tanks or containers.

1. Does the generator treat restricted wastes in less than 90 day accumulation tanks or containers to meet treatment standards (specify which)? ___Yes___No

   If yes, specify waste types and treatment processes used?

   _____

   _____

   _____

2. Does the generator have a written "Waste Analysis Plan"? ___Yes X No

3. Does the plan include the following:

   A. A detailed chemical/physical analysis of a representative sample of the waste? ___Yes___No

   B. Testing frequency and procedures? ___Yes___No

4. Is the plan maintained on-site? ___Yes___No

5. Has the plan been filed with the Regional Administrator at least 30 days prior to the initiation of the treatment process? ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

265 SUBPART G - CLOSURE AND POST-CLOSURE

Closure Performance Standards (265.111)

1. Have all active portions of the facility undergone closure? ___ Yes X No

   If yes,

   a. Has the owner/operator minimized the need for further maintenance? ___ Yes ___ No

   b. Are there controls to minimize or eliminate leachate, run-off, or contamination to the groundwater? ___ Yes ___ No

Closure Plan and Amendments (265.112)

1. Does the plan include the following:

   i. A description of how each hazardous waste management facility will be closed? ___ Yes X No

   ii. A description of how final closure will be conducted in accordance with 265.111? ___ Yes X No

   iii. An up-to-date estimate of the maximum inventory of wastes ever on site over the life of the facility? ___ Yes X No

   If yes,

   A. Does it include a detailed description of the methods to be used during partial and final closure and; ___ Yes ___ No

   B. Methods for removing, transporting, treating, or disposing of all hazardous wastes? ___ Yes ___ No

   iv. A detailed description of the steps needed to remove or decontaminate all hazardous waste residues and contaminated containment system components, equipment, structures, and soils? ___ Yes X No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

v. A schedule for closure of each hazardous waste management unit? ___Yes X No

vi. An estimate of expected year of closure? (not applicable to federal, state, or local facilities) ___Yes X No

2. Does the plan include a schedule for final closure? ___Yes X No

If yes, does it include:

a. Time estimates for each phase of closure for each area? ___Yes___No

b. Total time estimate for closure? ___Yes___No

3. Has the plan been amended as necessary to reflect changes in facility operations or design? ___Yes X No

If yes,

a. Were the plans amended 60 days prior to change in facility design or operation? ___Yes___No

4. Have closure activities begun at the facility? X Yes___No

If yes,

a. Was the closure plan submitted to the Regional Administrator at least 180 days prior to beginning these activities? ___Yes X No

b. Were all wastes treated or disposed of within 30 days of the final receipt of wastes? ___Yes X No

5. Did actual closure activities correspond to those written in the closure plan? X Yes___No

Attach a copy of the most current Closure Plan.

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434195

Time Allowed for Closure (265.113)

1. Was closure completed within 180 days of receipt of final volume of wastes? ___Yes X No

   If no, explain.

Disposal or Decontamination of Equipment, Structures, and Soil (265.114)

1. Were all equipment, structures, and soil disposed or decontaminated properly during partial, or complete closure of the facility? ___Yes X No

   If yes,

   a. Did the owner/operator treat residues and discarded, contaminated equipment as hazardous waste? ___Yes___No

Certification of Closure (265.115)

1. Within 60 days of final closure, did the facility submit a certification of closure to the Regional Administrator? ___Yes___No

   If yes,

   a. Was it signed by both the owner/operator and an independent, registered professional engineer? ___Yes___No

Survey Plat (265.116)

1. Upon certification of closure, did the owner/operator submit a survey plat which indicates the location of all hazardous waste disposal units? ___Yes___No

   If yes,

   a. Was this plat prepared and certified by a professional land surveyor? ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

Note: **The remainder of this checklist is applicable only to facilities with hazardous waste land disposal units (i.e. landfills, surface impoundments, etc...).**

Post-Closure Care and Use of Property (265.117)

1. Are there any hazardous waste management units which have been certified closed and undergoing post-closure care? ___Yes___No

   If yes,

   a. Is the facility on a 30-day post-closure care schedule? ___Yes___No

      If no,

      i. Did the Regional Administrator grant a variance? ___Yes___No

      If yes,

      i. Indicate the length of the approved variance:

      _____

      ii. Indicate how long post-closure care has occurred:

      _____

2. Has the area undergoing post-closure care been disturbed by other than post-closure care activities? ___Yes___No

   If yes, explain

Post-Closure Plan (265.118)

1. Does the facility have a post-closure plan? ___Yes___No

FACILITY NAME: SBA Shipyards

EPA ID NUMBER: LAD008434185

If yes,

a. Does the plan include:

i. A description of planned groundwater monitoring activities and frequencies? ___Yes___No

ii. A description of planned maintenance activities and frequencies to ensure the following:

A. Integrity of cap, final cover or other containment? ___Yes___No

B. Proper function of groundwater monitoring equipment? ___Yes___No

iii. Name, address and phone number of facility contact for post-closure activities? ___Yes___No

2. Has the plan been amended, during the operating life of the facility, to reflect changes in operation or design? ___Yes___No

Give a summary of planned post-closure activities.

3. Has a notation been made on the deed to the property to show that the land has been used to manage hazardous wastes and that further use must not disturb the integrity of post-closure maintenance? ___Yes___No

4. Have post-closure activities begun at the facility? ___Yes___No

If yes,

a. Do these activities correspond to planned activities written in the post-closure plan? ___Yes___No

FACILITY NAME: SBA Shipyards
EPA ID NUMBER: LAD008413485

Post-Closure Notices (265.119)

1. Have changes in monitoring or maintenance events during the post-closure period necessitated changes in the plan? ___Yes___No

If yes,

i. Was a petition filed with the Regional Administrator? ___Yes___No

ii. Has the facility received a written response from the Regional Administrator? ___Yes___No

Certification of Post-Closure Care Completion (265.120)

1. Has the owner/operator completed the post-closure care period? ___Yes___No

If yes,

a. Was a certification submitted to the Regional Administrator that the post-closure care period was performed according to the approved post-closure plan? ___Yes___No

If yes,

i. Was this certification signed by both the owner/operator and an independent, registered professional engineer? ___Yes___No

GENERATORS CHECKLISTS

1. Samples analyzed by the Louisiana Department of Environmental Quality (LDEQ) indicate that sludges in two (the oil pit and water pit 2) of the four surface impoundments are hazardous, based on the toxicity characteristic (TC). The sludge samples were hazardous because of TC concentrations of benzene (D018), 1,2-dichloroethane (D028), tetrachlorethene (D039), and trichloroethene (D041).

   No information on hazardous waste volume is available.

2. The following solid waste management units on site that may contain hazardous wastes, but they have never been characterized:

   - Several barges used as tanks
   - One landfill
   - Several waste piles scattered around the site
   - Areas in which asphalt has been spread on the ground

3. Wastewater from water pit no. 3 is recycled to the boilers and barge cleaning works.

4. Waste oil from the oil/water separator is sold to a waste oil recycler.

5. The facility owner, Mr. Louis Smaihall, stated that the facility does not generate hazardous waste; therefore, no hazardous wastes are transported off site. Solid waste manifests are retained by the facility.

GENERATORS CHECKLIST--SUPPLEMENT

1. The following evidence of contamination of the environment was observed during the inspection:

   - Stained soils and asphalt puddles throughout the site
   - Hydrocarbon sheens in the site drainage ditch
   - Absence of surface water runon and runoff control for the landfarm
   - Wastes from barge cleaning, which had been mixed with sand and placed directly on the ground

SURFACE IMPOUNDMENTS

There are four surface impoundments that treat wastewater generated during barge cleaning activities. Figures 2 and 3 of this report show the location of the impoundments.

The four impoundments were excavated around 1970. The impoundments were not lined, although Mr. Smaihall stated that the local soils consist of clay.

Wastewater from the barge cleaning operations is pumped into the oil pit. Historically, after gravity separation, wastewater was pumped from the oil pit to water pit 1, then water pit 2, and finally water pit 3. Water from water pit 3 is recycled back into the barge cleaning process.

The surface impoundments treat barge cleaning wastewater by gravity separation. The oil pit and water pit 2 are full of sludge. Mr. Smaihall stated that water pit 1 and the oil pit were originally dug about 18 feet deep, and water pits 2 and 3 were about 6 feet deep.

LAND TREATMENT

A small land treatment unit was operated to treat stabilized sludges from water pit 1. In 1991, SBA pumped water and oil from water pit 1, and added flyash and lime to stabilize the remaining sludges. About one-third of the stabilized sludges was removed from the pit and placed on the ground surface for land treatment. The land treatment area is about 200 feet long and 100 feet wide. The land treatment unit has been inactive for about 1 year. There is no vegetative cover or surface water runon and runoff control. Runoff water has formed small puddles in the grassy area north of the land treatment unit, near monitoring well MW-1. Runoff water flows into a small drainage ditch that empties into the Mermentau River.

Toxicity characteristic leaching procedure (TCLP) analysis of a sludge sample collected by LDEQ from water pit 1 indicated that the impoundment contains hazardous waste. SBA performed TCLP analysis of the stabilized sludge, which indicated that the stabilized sludge was not hazardous waste.

LANDFILL

A landfill is located east of the barge slip. Mr. Smaihall stated that the landfill contains mostly brush and trash. Mr. Smaihall also stated that the landfill contained "a few" paint cans. LDEQ previously reported that thousands of paint cans were buried in the landfill. Several rusted paint cans, brush, trash, and asphalt waste were observed on the surface of the landfill.

It is not known whether containerized liquid wastes were placed in the landfill. However, empty paint cans were placed in the landfill. It is possible that containerized liquid wastes were also disposed of in the landfill. Also, liquid asphalt wastes were disposed of in and near the landfill.

No surface water runon and runoff control or leachate collection measures were implemented. Ponded water was observed over the landfill surface. Runoff drains into a wetland next to the Mermentau River.

TANKS

Eight tanks were identified during the inspection. During the inspection, it was not known whether the tanks contain hazardous wastes. However, they store waste that is similar to wastes that have been placed into two impoundments that are hazardous.

Sludge Tank

The sludge tank is a double-hulled barge that was sealed, overturned, and placed in the pond area, west of the oil pit. The tank stores sludges from the ponds and barge cleaning activities. Several small leaks were observed on the west end of the tank.

Barge Tanks 1, 2, and 3

The three barge tanks in the pond area were built in 1992 by cutting a 9500-barrel double-hulled barge into three pieces, sealing the tanks, and placing them upside-down west of the oil/water separator and water pit 1. These tanks, which have open tops, are used to separate and store water, oil, and sludge from the barge cleaning activities. Several small leaks were observed on one of the tanks.

Oil Tank

The oil tank is a horizontal aboveground tank that is located next to the oil/water separator. This tank stores oil prior to off-site shipment by a used oil recycler.

Asphalt Tanks 1 and 2

These tanks store asphalt from barges. It is not known whether these tanks are full.

Barge Tank 4

Barge tank 4 is a whole barge that is partially buried in the barge slip levee. The barge was full of oil or oil sludges.

WASTE PILES

Several waste piles were observed on the site, mostly on the barge slip levee and next to the wetlands at the south end of the site. The waste piles ranged from less than 1 to about 10 cubic yards. These piles contained solid waste typically composed of barge cleaning residues and sludges mixed with sand. No analysis has been performed on the waste, so it is not known whether the material is hazardous.

APPENDIX B

PHOTOGRAPHS

APPENDIX C

SAMPLE DOCUMENTATION

RECEIPT FOR SAMPLES

United States Environmental Protection Agency

1445 Ross
Dallas, TX 75220

Arkansas, Louisiana
Oklahoma, Texas
New Mexico

EPA

08/25/94
(Date)

Luis Vega
(Name & Title of EPA Representative)

(Signature)

DESCRIPTION OF SAMPLES COLLECTED

Sample Number	Time	Place Collected	Type	Volume	Split Sample Required	Split Sample Provided
SBA01	1250	Pond 3	Sludge	32 oz		
SBA02	1300	Pond 3	Sludge	32 oz		
SBA03	1320	Pond 2	Sludge	32 oz		
SBA04	1330	Pond 2	Sludge	32 oz		
SBA05	1355	Oil Pit	Sludge	64 oz		
SBA06	1410	Oil Pit	Sludge	32 oz		
SBA07	1415	Oil Pit	Sludge	32 oz		
SBA08	1510	Sludge Storage	Sludge	32 oz		
SBA09	1520	Sludge Storage	Sludge	32 oz		
SBA10	1540	Old Pond 1	Sludge	32 oz		

Acknowledgement of Facility Representative

The undersigned acknowledges that the samples described above have been collected.

Owner SBB [illegible]
(Name & Title of Facility Representative)

(Signature)

8-25-94
(Date)

(Address of Facility Representative)

DISTRIBUTION: One copy to Facility Representative
One copy for Inspector's Records
Original to Regional Office (6ASASC)

RECEIPT FOR SAMPLES

United States Environmental Protection Agency

1445 Ross Dallas, TX 75220

Arkansas, Louisiana Oklahoma, Texas New Mexico

EPA

Luis Vega 08/25/94

(Name & Title of EPA Representative) (Signature) (Date)

DESCRIPTION OF SAMPLES COLLECTED

Sample Number	Time	Place Collected	Type	Volume	Split Sample Required	Split Sample Provided
SBA-11	0805	Canal	Soil	32oz		
SBA-12	0812	Canal	Soil	32oz		
SBA-13	0817	Canal	Soil	64oz		
SBA-14	0850	Landfill Area	Soil	32oz		
SBA-MW3	MW3	1335	Water	3 gal		
SBA-MW2	MW2	1415	Water	2 gal		
SBA-MW1	MW1	1440	Water	1 gal		

Acknowledgement of Facility Representative

The undersigned acknowledges that the samples described above have been collected.

S.B.A. Skyroad

(Name & Title of Facility Representative) (Signature)

8-25-94

(Address of Facility Representative) (Date)

DISTRIBUTION: One copy to Facility Representative
One copy for Inspector's Records
Original to Regional Office (6ASASC)

Inchcape Testing Services
West-Paine Laboratories
(504) 769-4900 • Fax (504) 767-5717

CHAIN OF CUSTODY RECORD

Lab use only:

Client Name	Client #	Group #	Due Date
PRC	2291	940 3017	9-06-94

Submitted by
Client: PRC
Address: 3EON. ST. PAUL ST. #2600
DALLAS, TX 75201
Contact: JOAN MIDDLETON
Phone: (214) 754 8765
Fax: (214) 922-9715

Bill to
Client: (Same as Left)
Address:
Contact:
Phone:

ORIGINAL

P. O. Number

Project Name/Number: SBA SHIPYARDS / 070R0602401SA

Sampled By: [signature] W. Pierson Paul Dubois

Analytical Requests: VOA, ABN, TOTAL METALS, RCI

Lab use only: LAB M, Gen Chem, Metals, GC/MS VOA, GC/MS Semi-V, GC/Semi-V, GC, Extractions, Client Services, Ship, Info Request

Matrix¹	Date	Time (2400)	Comp	Grab	Sample Description	Preservatives	No. Containers	Remarks	Lab ID
W	8/25/94	1335		X	SBA-MW03	HCl Sod Thios	6	MS/MSD	21
W		1335		X	↓		12	MS/MSD	
W		1355		X	SBA-MW02A	HCl Sod Thios	2		24
W		1355		X	↓		4		
W		1415		X	SBA-MW02B	HCl Sod Thios	2		25
W		1415		X	↓		4		
W		1440		X	SBA-MW01	HCl Sod Thios	2		26
W		1440		X	↓		4		
W	8/25/94	1525		X	SBA-ER02	HCl Sod Thios	2		27
W		1525		X	↓		4		
W		1530		X	SBA-FB02	HCl Sod Thios	2		28
W	8/25/94	1550		X	SBA-TB02	HCl Sod Thios	2		29

Lab use only: Custody Seal used ☐ yes ☐ no; in tact ☐ yes ☐ no
Temperature °C 10°

Turn Around Time: ☐ 24-48 hrs. (min. 100%) ☐ 3 days (75%) ☐ 1 week (50%) ☐ Standard Other _____

Relinquished by: (Signature)	Received by: (Signature)	Date:	Time:
[signature]	Michelle Crochet	8/26/94	1110
Relinquished by: (Signature)	Received by: (Signature)	Date:	Time:
Relinquished by: (Signature)	Received by: (Signature)	Date:	Time:

Note:

___ Water
___ Solid
___ Oil
___ Sludge

By submitting these samples, you agree to the terms and conditions contain[illegible] most recent schedule of services.

Matrix¹: W [illegible]ter, S = soil, SD = solid, L = liquid, SL = sludge, O = [illegible] [illegible]rcoal tube, A = [illegible]g

We can [illegible]t verbal changes. Please fax written change [illegible]504) 767-5717.

Inchcape Testing Services
West-Paine Laboratories
(504) 769-4000 • Fax (504) 767-5717
CHAIN OF CUSTODY RECORD

Lab use only: PRC | 2291 | 9403016 | 9-6-94
Client Name | Client # | Group # | Due Date

Submitted by
Client: PRC
Address: 350 N. ST. PAUL #2600
DALLAS, TX 75201
Contact: JOAN MIDDLETON
Phone: (214) 754-8765
Fax: (214) 922-9715

Bill to
Client: (SAME AS AT LEFT)
Address:
Contact:
Phone:

P. O. Number
Project Name/Number: SBA SHIPYARDS 070R0602401SA

Sampled By: [signature] Paul Rodgers

ORIGINAL

Analytical Requests: VOA, ABN, TOTAL METALS, TCLP VOA/ABN/METALS, IGNITABILITY

Lab use only: LAB M, Gen Chem, Metals, GC/MS VOA, GC/MS Semi-V, GC/Semi-V, GC, Extractions, Client Services, Ship, Info Request

Matrix[1]	Date	Time (2400)	Comp	Grab	Sample Description	Preservatives	No. Containers	Remarks: TF	Lab ID 08120
SL	8/24/94	1250		X	SBA-01		1		30
SL	8/24/94	1300		X	SBA-02		1		31
SL	8/24/94	1320		X	SBA-03		1		32
SL	8/24/94	1330		X	SBA-04		1		33
SL	8/24/94	1355		X	SBA-05		2	-05 MS/MSD-36	34
SL	8/24/94	1410		X	SBA-06		1		37
SL	8/24/94	1415		X	SBA-07		1		38
SL	8/24/94	1510		X	SBA-08		1		39
SL	8/24/94	1520		X	SBA-09		1		40
SL	8/24/94	1540		X	SBA-10		1		41
W	8/24/94	1105		X	SBA-TB01	HCl Na2S2O3	2		42
W	8/25/94	0915		X	SBA-FB01	HCl Na2S2O3	2		43

Lab use only: Custody Seal used ☑ yes ☐ no; in tact ☑ yes ☐ no
Temperature °C 12C

Turn Around Time: ☐ 24-48 hrs. (min. 100%) ☐ 3 days (75%) ☐ 1 week (50%) ☐ Standard Other _____

Relinquished by: (Signature)	Received by: (Signature)	Date:	Time:
[signature]			
Relinquished by: (Signature)	Received by: (Signature)	Date:	Time:
[signature]	[signature]	8-25-94	18:40
Relinquished by: (Signature)	Received by: (Signature)	Date:	Time:

Note: TURNAROUND TIME IS AS PER BID

17 w/mats
4 a L
4 sets VOA

By submitting these samples, you agree to the terms and conditions contain[illegible] most recent schedule of services.

Matrix: W Water, S Soil, SD Solid, L Liquid, Sl Sludge, O Oil, [illegible]

☐ Water ☐ Solid ☐ Oil ☐ Sludge

Inchcape Testing Services
West-Paine Laboratories
(504) 769-4000 • Fax (504) 767-5717

CHAIN OF CUSTODY RECORD

Lab use only:			
Client Name	Client #	Group #	Due Date
		9403016	

Submitted by	Bill to
Client: PRC	Client: (Same
Address: 350 N. St. Paul #2600 Dallas TX 75201	Address: as Left)
Contact: Joan Middleton	Contact:
Phone: (214) 754-8765	Phone:
Fax: (214) 922-9715	

P. O. Number:

Project Name/Number: SBA Shipyards 070R0602401SA

Sampled By: Paul Dubois [signature]

Lab use only: LAB M ☐☐ Gen Chem ☐☐ Metals ☐☐ GC/MS VOA ☐☐ GC/MS Semi-V ☐☐ GC/Semi-V ☐☐ GC ☐☐ Extractions ☐☐ Client Services ☐☐ Ship ☐☐ Info Request ☐☐

Analytical Requests

Matrix¹	Date	Time (2400)	Comp	Grab	Sample Description	Preservatives	No. Containers	VOA	ABN	TOTAL METALS	TCLP: VOA, ABN, METALS	IGNITABILITY	Remarks: 94	Lab ID 08126
W	8/25/94	0920		X	SBA-ER01		26	X	X	X		X		45
W	8/25/94	1108		X	SBA-TB02	HCl $Na_2S_2O_3$	2	X				~~X~~ →		46
S	8/25/94	0805		X	SBA-11		1	X	X	X	X	X		48
S	8/25/94	0812		X	SBA-12		1	X	X	X	X	X		49
S	8/25/94	0817		X	SBA-13		2	X	X	X	X	X	MS[51]/MSD[52]	50
S	8/25/94	0850		X	SBA-14		1	X	X	X	X	X		53

Turn Around Time: ☐ 24-48 hrs. (min. 100%) ☐ 3 days (75%) ☐ 1 week (50%) ☐ Standard Other ____

Lab use only:
Custody Seal
used ☑ yes ☐ no
in tact ☑ yes ☐ no
Temperature °C 9°C

Relinquished by: (Signature)	Received by: (Signature)	Date:	Time:
Paul Dubois [signature]			
[signature]	[signature]	8-25-94	18:40

Note:

___ Water
___ Solid
___ Oil
___ Sludge

By submitting these samples, you agree to the terms and conditions conta[...] most recent schedule of services.

Matrix¹: W[redacted]

APPENDIX D

SITE LOGBOOK

08/23/94

SBA SHIPYARDS, INC

070R060240 1SA

JENNINGS, LA

LAD008434185

COMPLIANCE EVALUATION

INSPECTION

AND

SAMPLING

INSPECTION

EPA WAM = GREG PASHA

PM = JOAN MIDDLETON, PRC

CEI INSP = PAUL DUBOIS, PRC

SAMPLER = LUIS VEGA, PRC

SAMPLER = WADE PIERSON, PRC

(2)

1130 MEET PAUL DUBOIS @ DFW AIRPORT

1150 FLY TO BATON ROUGE, LA.

1330 PICK UP RENTAL VAN AND GO TO PRC BATON ROUGE OFFICE; MEET WADE PIERSON.

1430 PICK UP VIDEOCAMERA AND DRIVE TO JENNINGS, LA

1630 ARRIVE IN JENNINGS. CHECK INTO HOTEL; STORE FEDEX EQUIP IN LUIS VEGA'S ROOM

1700 CALL GREG PASHIA; WAIT FOR LDEQ TO ARRIVE' CHECK SUPPLIES.

08/23/94 (3) ODORADISA

1730 MEETING WITH LDEQ & EPA; ATTENDING:

GREG PASHIA = EPA (GP)

ROY VARNADO = LDEQ (RV)

PAUL DUBOIS = PRC (PD)

WADE PIERSON = PRC (WP)

LUIS VEGA = PRC (LV)

FREE PHASE @ 13'-15' BGS IN BORINGS

4 MWS: 25'-35' SCREEN INTERVAL

WATER TABLE @ 9-12' BGS

OWNER IS 75-80 YEARS OF AGE

SOMEWHAT ANTAGONISTIC

B11 - 1'-5' BGS N. OF CLOSED PIT (ODOR)

④ 08/23/94 Greg 070R0602401SA

GREG: NOTE SWMUS WHICH NEED FUTURE INVESTIGATION

- FOCUS SAMPLING ON IMPOUNDMENTS AND LANDFILL
- SAMPLE MW 1 & 3
- WATER PIT #1 IS UNDER CLOSURE SLUDGE PILED ALONGSIDE PIT IS EXCAVATED
- LANDFARM IS WEST OF WATER PIT #1
- WATER ~~PIT #2~~ OIL PIT #2 IS PROBABLY THE NASTIEST
- PIT #3 IS PROBABLY THE CLEANEST
- PITS 1 & ~~2~~ OIL PIT — USED OWNER'S DRAGLINE TO SAMPLE (LDEQ)
- SLUDGE STORAGE – BARGE HOLD USED AS OIL-WATER SEPARATOR

⑤ 08/23/94 Greg 070R0602402SA

- 2 - Sludge piles (south prop)
- 1 - closed impdt
- 2 ea - other 3 impdts (sludge)
- 3 - canal/ditch { 1 water, 2 sediment
- 2 - MWs
- 2 - old landfill/pond

TB locations { 2 sludge/soil dupl MS/MSDs; 1 water dup/MS/MSD; 1 gw dup/MS/MSD

- LDEQ RECOMMENDS LEVEL C FOR SAMPLING AROUND/IN IMPOUNDMENTS
- LEVEL D OTHER AREAS
- JENNINGS AMERICAN LEGION HOSPITAL – HAZMAT EMERGENCIES
- ACADIANA AMBULANCE
- WALMART – SOUTH JENNINGS
- STEIN LUMBER
- GREG IN ROOM 219
-

⑥

08/23/94 070R060240ISA

1830 END OF MEETING
PRC TO CV'S ROOM TO INVENTORY EQUIPMENT

1845 CV CALLS SUE TOKEY OF WESTPHANE LABS; SET UP SAMPLE PICKUP FOR THURSDAY

1900 PRC OFF TO PURCHASE SUPPLIES. FILM, VIDEOTAPE, WATER, PAPER TOWELS, ETC

1930 DINNER

2000 BACK TO HOTEL TO PREPARE EQUIPMENT FOR SAMPLING; PACK AND LABEL COOLERS; CLEAN ALL SAMPLING EQUIPMENT W/ ~~ACETONE~~ LIQUINOX WASH & WATER D.I. WATER RINSE.
CV CALLS SUE LOKEY FOR VOA & BN BOTTLES - WILL DELIVER BY LUNCH TOMORROW TO HTL.

⑦

08/23/94 070R060241SA

2100 COMPLETE PREPARATIONS
END OF DAY

(8)

08/24/94 070P0602401SA

0630 MEET IN LV's ROOM TO BAG ICE & LOAD VAN

0650 DRIVE TO SHONEY'S EAT BREAKFAST

0715 LV HOLDS H&S MTG. DEFINE CONTAMINANTS OF CONCERN, SITE HAZARDS, LEVELS OF PROTECTION FOR SAMPLING ACTIVITIES, HEAT STRESS, ETC.

0725 EVERYONE SIGNS SAFETY PLAN.

0730 GP ARRIVES.

0740 RV ARRIVES.

0745 HEAD TO SITE

0800 ARRIVE AT SITE @ END OF SR 3166 (BRUCE LANE) ROAD PARALLELS MEHRMANTAU; SEVERAL HUNTING LODGES/RESIDENCES & CITGO PIPELINE STORAGE TANK

(9)

0810 OWNER NOT IN OFFICE; DRIVE TO PLANT/FACILITY OFFICE

0820 MEET MR. SMAIHALL BEGIN TOUR OF SITE NAPHTHENE SMELL — "MOTHBALLS" OTHER VOLATILE ODORS APPARENT

0830 TOUR IMPOUNDMENTS AREA, BARGE CLEANING AREA, OLD LANDFILL AREA (OR THOUSANDS OF OLD TIRES), AND DRYDOCK BARGE REPAIR AREA.

0940 WP & LV DEPART SITE TO MAKE PHONE CALLS & PURCHASE ADDITIONAL EQUIPMENT.
PURCHASE 120' (12 x 10') CPVC 3/4" DIAM TO USE AS EXTENSION POLES FOR SAMPLING IMPOUNDMENTS.
1045 VISITOR INFORMATION CENTER FOR MAPS.
1100 TO HOTEL, PICKUP VOA BOTTLES, CALL LAB; CALL LISLE FOR H_2O LEVEL INDICATOR (TO BE DELIVERED TOMORROW AM); CALL SAM TO UPDATE - SHE WILL ORDER INTERFACE PROBE FOR SAN ANTONIO NEXT WEEK.
1120 RETURN TO SITE MEET W/ PD TO DISCUSS

ACTIVITIES FOR REST OF DAY. DRIVE TO AREA OF SITE WHERE IMPOUNDMENTS ARE LOCATED TO SET UP BASE CAMP FOR SAMPLING ACTIVITIES.
SAMPLING OF SLUDGE IN IMPOUNDMENTS WILL BE IN LEVEL C W/ GMC-H CARTRIDGES, APR, TYVEK, BOOT COVERS, NITRILE SURGIES & NITRILE GLOVES (TAPED UP). WILL CHANGE GLOVES BETWEEN IMPOUNDMENTS.

[signature]

(12)

8-24-94 Paul Dubois 070R0602401SA

1205 Set up base on the lay-down area west of Water Pit #2.

Paul Dubois - Documentation

Wade Pierson - Sampler

Luis Vega - Sampler

Plan: Sample impoundments, 1 cleanest to dirtiest, starting with Water Pit #3.

Impoundment sludge / sediment samples will be collected with a polyethylene scoop attached to a PVC pole. Samples will be placed in a stainless steel ~~pail~~ bowl before being placed in a jar.

1305

(13)

8-24-94 Paul Dubois 070R0602401SA

1250 Begin collecting sample Ø1, at the east end of pond 3. Slight sheens was noted on the water surface, and the sample presented a mild sheen also.

Sample collected by Wade Pierson (WP) and containerized by Luis Vega (LV).

1255 Finish Ø1

1300 Move to Ø2, begin sampling at west end of pond 3. Same sampling method. Samples are placed into 32oz glass jars provided by the laboratory. Lot # 133-32C. One 32-oz jar per sample location.

Finish Ø2 (SBA-Ø2)

(14)

8-24-94	Paul Dubois 070R0602401SA
1310	All sampling activities are being conducted in Level C PPE. Luis Vga noted that Sample ØZ was substantially more oily than Ø1.
	Photographs (Slide + Print) were taken of each sampling location. Video camera shots taken at each location also
1320	Begin collecting SBA-03, located at the north end of Water pit #3, next to the pipe from the separator.
	Photos + video taken. Luis collected and Wade containerized the sample
1324	Finish SBA-Ø3

(15)

8-24-94	Paul Dubois 070R0602401SA
1330	Begin collecting SBA-Ø4 located at the southwest corner of ~~oil~~ pit PDD water pit no. 2. Photos + video
1335	Finish SBAØ4 samples placed on ice. Equipment left on location for decon later.
1355	Begin collecting SBA Ø5. This will be a MS/MSD located at the south end of the oil pit. Wade is sampling and Luis is containerizing. Media is a very oily sludge.
1405	Finish SBAØ5 MS/MSD Double volume. Photo.

(14) 8-24 1310

(16) 8-24-94 Paul Dubois 0702060240ISA

1410 Begin collecting SBA06/07 (Duplicate), located at the north end of the oil pit. Luis observed this sludge to be more fluid than at location Ø5.

Does not appear to be adequate freeboard for this impoundment. The north end is about 5 to 6 feet above (higher) than the road.

1415 Photo and finish 06/07

Paul Dubois 0702060240ISA (17)

1510 Begin sampling at SBA-08 Sample collected from the barge due west of the oil pit. There are several small leaks comming from the "bow" of the former barge. Photograph

1513 Sampling complete.

1520 Begin sampling at SBAØ9, ~~which is~~ PDD ~~[illegible]~~ one of the tanks near the oil/water separator. This tank is closest to the separator.

1524 Finish sampling Ø9.

(18)

08/24/94 070R0602401SA

1540 Begin sampling SBA10, located at the old Water pond #). Photos. Location is on the north side of the impoundment

1545 Finish SBA10. Begin cleanup.

1630 Depart site for day.

Paul Dubois

1650 ~~ARRIVE~~

1650 ARRIVE @ HOTEL.

1845 DINNER

2000 PD & LV COMPLETE PAPERWORK ON TODAY'S SAMPLES; PACKAGE & ICE DOWN SAMPLES FOR PICKUP TOMORROW

2115 END OF DAY

(19)

08/25/94 070R0602401SA

0640 GOTO BREAKFAST

0730 ARRIVE ON-SITE

WEATHER: WARM - 80S, MUGGY (VERY HUMID) OVERCAST

WILL COLLECT SEDIMENT SAMPLES FROM DRAINAGE CANAL LOCATED NORTH OF IMPOUNDMENTS. SAMPLERS WILL WEAR NEOPRENE BOOTS W/ BOOT COVERS, TYVEK, NITRILE SURGIES, NITRILE GLOVES (TAPED UP), SAFETY GLASSES. SAMP~~L~~ SET UP CP ADJACENT TO CANAL; PLACE SHEET OF VISQUEEN DOWN - THEN PLACE GEAR ON EQUIP PLASTIC.

(20)

8-25-94	Paul Dubois	070R6024015A	8-25-94	Paul Dubois	070R6024015A
0800	We have probed along the drainage ditch between the ~~Hexmont~~ PDD Oil Pond and the barge slip. Numerous oil sheens bubble to the surface when disturbed.		0817	Begin sampling SBA-13. This will be an MS/MSD. This sediment sample was very oily and had a strong odor.	
0805	Begin sampling SBA-11 LV and WP samplers. Sediment will be scooped from the ditch into a stainless steel bowl, water decanted, the sediment transfered to a 32-oz glass jar. This will be a duplicate location (SBA-12) also. Photo + Video.		0822	Finish SBA-13. PDD Photo and Video. Pack up and move to landfill area.	
0812	Complete SBA-11/12		0850	Begin sampling sediment at SBA-14, which is in the landfill area. There is lots of asphalt dumped here.	
			0855	Finish sampling SBA-14	

(21)

(22)

8-25-94 Paul D. Lacy 070AX0240154

0915 Begin Collecting SBA-FB01

Field Blank - by pouring HPLC water directly into 2 40 ml VOA vials. LV Pours. No bubble

0917 Finish sampling SBA-FB01

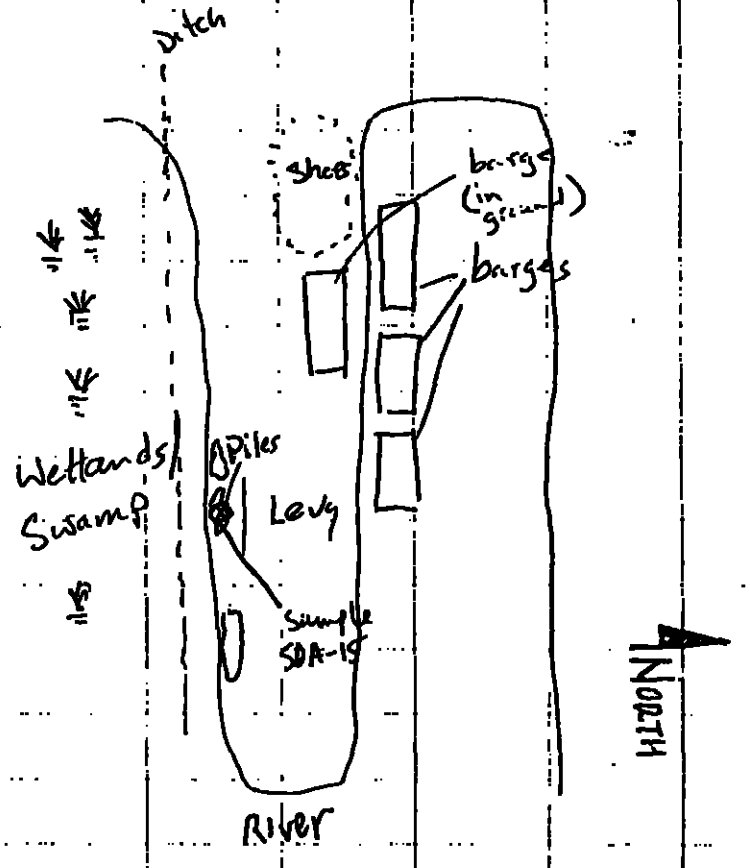
0920 Begin Sampling SBA-EQ01

Equipment rinsate. This sample was collected by pouring water over a decon'ed stainless steel scoop, into a decon'ed steel pan, and into the sample containers. We collected 2x 40ml and 4x ~~1~~ 32 oz jars.

9-25-94 070AX0240154SA Paul D. Lacy

0945 Roy Varnado (DEQ) showed PRC several piles of waste that were dumped on the west side of the barge slip levy. Photos and Video

(23)



(24)

8-25-94 Paul Dubois 070R06624415A

1000 Begin sampling SBA-015. Use trowel and place directly into jar. Photos and Video Wade sampled.

1003 Finish Sampling SBA-15

1010 Depart site, return to Jennings to get Fed Ex shipment and pack samples for shipment

1105 Prepare tripblank -SBA-TBØ1

1108 Prepare tripblank -SBA-TBØ2

L. Vage

1115 ~~DEPART~~ LV calls lab for sample pickup — will pickup @ 4-5 PM today

1200 Depart for site

L. Vage

8-25-94 Paul Dubois 070R06624415A (25)

1215 Back on site, prepare to collect monitoring well samples.

Water levels in MW-3

Top: 7.75 ft

Bottom: 27.45 ft

Volume: ~~2~~ $\pi R^2 \Delta H$ (100)

$R = 1'' (\frac{1}{12}')$; $\Delta H = 19.7'$

$V = (~~2~~100)(3.14)(\frac{1}{12})^2(19.7) = ~~1.32~~ 0.43 \ ft^3$

$V = ~~1.32~~ 0.43 \ ft^3 (\frac{7.48 gal}{1 ft^3}) = 3.21$ gal

Purge water placed in Water Pit No. 3. 3 volumes = 9.6 gal.

1230 MW-2

Top: 5.45

Bottom: 28.85 $\Delta H = 23.4$

$V = (\frac{1}{12})^2 \pi (23.4) = 0.51 \ ft^3 (7.48 \ gal/ft^3) = 3.81$ gal

3V = 11.5 gallons, purged and placed in Water Pit 3.

1240 MW-1 Top: 12.05
Bottom: 30.75 $\Delta H = 18.9$
$V = \pi r^2 \Delta H = 3.14 \left(\frac{1}{12}\right)^2 18.9$
$V = 0.41 ft^3$; $3V = 1.23 ft^3$ (7.48 ft³/gal) = gallons = 9.25, purged and placed in Water Pit 3

1315 Begin sampling MW3. Filled 6 x 40 ml VOA, 12 x 32 oz amber glass.
~~Pt~~ PDD Water was poured directly from the bailer into the bottles (MS/MSD)

1335 Finish sampling SBAMW3.
Photos

1355 Begin sampling SBA-MW2
This will be a duplicate [SBA-MW2A and SBA-MW2B]

1415 Finish sampling MW2

1430 Begin sampling SBA-MW1
1440 Finish sampling SBA-MW1
2x 40 ml VOA, 4 x 32 oz amber.

Paul Dubois

1450 PD WILL VIDEOTAPE SITE ON FOOT WHILE LV & WP COMPLETE DOCUMENTATION
PER GREG PASHIA (EPA) PRC DID NOT CONDUCT WATER QUALITY READINGS ON GROUNDWATER

1515 LV COMPLETES COCs AND RECEIPT FOR SAMPLE FORMS

(28) 8/25/94 Paul Dukes 070 R602401SA

1525 Collect SBA-ER02 Equipment Rinsate

1530 Collect SBA-FB02 Field Blank

1540 Per Greg Pashia (EPA), we are returning SBA-15 to the sample location.

Paul Dukes

1600 DRIVE TO SBA OFFICE AND SPEAK W/ MR. SMALLHALL MAKE COPIES OF COCs & RECEIPT FOR SAMPLES; GIVE 1 COPY OF EACH TO MR. SMALLHALL; GIVE HIM KEY TO MONITORING WELL LOCKS

1615 DEPART SITE

1630 ARRIVE HOTEL

(29) 08/25/94

2000 LU & PD BEGIN PACKING SUPPLIES FOR FEDEX SHIPMENT - MOST OF EQUIP TO LISLE, IL; WATER LEVEL INDICATOR AND HNU TO SAN ANTONIO FOR KELLY AFB CME & SPLIT SAMPLING (070R602SO1SV); DISPOSABLE PPE & ABRS TO DALLAS.

PREPARE FEDEX FORMS

2200 COMPLETE PACKING END OF DAY

08/26/94 [signature] 070R060240154

0700 PD MEETS LV AND BEGIN PREPARATIONS FOR DEPARTURE
0800 PD/WP/LV PACKAGE WATER SAMPLES & PLACE THEM IN COOLERS ON ICE; PRC WILL HAND DELIVER SAMPLES TO WESTPAINS LAB IN BATON ROUGE.
0830 HAUL FEDEX GEAR TO FRONT LOBBY OF HOTEL FOR PICKUP @ NOON.
0845 PACK VAN
0915 DEPART HOTEL FOR BATON ROUGE.
1055 ARRIVE BATON ROUGE
1105 DROP OFF WATER SAMPLES @ LAB
1110 DEPART LAB FOR PRC

OFFICE.
END OF PROJECT

[signature]

APPENDIX E

DATA SUMMARY TABLES

TABLE E-1

GROUNDWATER SAMPLE RESULTS

Analyte	Units	SBA-MW01	SBA-MW02A	SBA-MW02B	SBA-MW03
Arsenic	mg/L	<DL	<DL	<DL	0.053
Copper	mg/L	<DL	0.026	0.030	0.031
Mercury	mg/L	0.0005	<DL	<DL	<DL
Selenium	mg/L	0.003	<DL	<DL	<DL
Zinc	mg/L	0.022	0.074	0.065	0.049
Flashpoint	°F	>206	>212	>212	>212
pH	--	7.2	7.0	7.1	6.9

Notes:

Groundwater samples were analyzed for volatile organics, semivolatile organics, metals, reactivity, corrosivity, and ignitability. Data on this table includes only detected constituents or measurable values.

SBA-MW02B is a duplicate of SBA-MW02A.
mg/L = Milligrams per liter
<DL = Analyte concentration was less than the detection limit.
NA = Not analyzed
°F = Degrees Fahrenheit

TABLE E-2
VOLATILE ORGANIC ANALYSIS OF SLUDGE/SEDIMENT SAMPLES

Analyte	SBA-01	SBA-02	SBA-03	SBA-04	SBA-05	SBA-06	SBA-07	SBA-08	SBA-09	SBA-10	SBA-11	SBA-12	SBA-13	SBA-14
Benzene	0.64	4.34	41.8	23.1	41.5	23.7	23.7	7.04	162	<DL	<DL	<DL	<DL	<DL
Carbon tetrachloride	<DL	<DL	<DL	<DL	<DL	28.1	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
Ethylbenzene	0.63	8.25	36.1	13.2	39.8	12.0	12.3	<DL	55.6	<DL	<DL	<DL	<DL	<DL
Methylene chloride	<DL	7.89	18.8	<DL	<DL	<DL	<DL	13.9	37.7	1.63	8.25	1.67	309	7.73
Tetrachloroethene	<DL	<DL	<DL	<DL	<DL	23.8	26.1	<DL	40.7	<DL	<DL	<DL	<DL	109
Toluene	1,010	10.3	97.4	50.8	135	49.2	46.7	16.9	230	<DL	<DL	<DL	<DL	<DL
1,1,2-Trichloroethane	<DL	3.44	<DL	<DL	<DL	<DL	15.1	<DL	<DL	<DL	<DL	<DL	<DL	<DL
Trichloroethene	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	36.6
Total xylene	8.70	48.8	350	183	295	273	296	22.3	1,220	<DL	<DL	<DL	<DL	<DL

Notes:

This table only presents the volatile organic compounds that were detected in one or more samples.
Sample SBA-07 is a duplicate of SBA-06, and SBA-12 is a duplicate of SBA-11.
All concentrations are in milligrams per kilogram (mg/kg).
<DL = Analyte concentration was less than the detection limit.

TABLE E-3

SEMIVOLATILE ORGANIC ANALYSIS OF SLUDGE/SEDIMENT SAMPLES

Analyte	SBA-01	SBA-02	SBA-03	SBA-04	SBA-05	SBA-06	SBA-07	SBA-08	SBA-09	SBA-10	SBA-11	SBA-12	SBA-13	SBA-14
Acenaphthene	60.4	571	1,320	942	<DL	<DL	<DL	2,480	1,570	<DL	<DL	<DL	<DL	<DL
Anthracene	168	1,310	4,910	3,350	2,210	1,170	1,060	11,700	6,190	3,150	218	424	1,270	<DL
Benzo(a)anthracene	56.5	448	<DL	<DL	<DL	<DL	<DL	1,340	1,010	<DL	<DL	68.9	<DL	<DL
Benzo(a)pyrene	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	49.0	<DL	<DL
Benzo(b)fluoranthene	50.8	419	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	68.9	<DL	<DL
Chrysene	77.7	526	1,020	906	834	869	875	1,810	1,350	<DL	41.4	106	<DL	<DL
Fluoranthene	221	1,610	3,110	2,740	2,490	3,120	3,090	5,850	4,060	<DL	84.0	217	<DL	814
Fluorene	92.3	707	2,030	1,620	1,270	954	978	4,120	2,530	<DL	<DL	46.3	<DL	<DL
Naphthalene	58.5	2,010	5,730	3,420	2,480	2,330	2,320	4,860	8,960	<DL	<DL	<DL	<DL	1,160
Phenanthrene	292	2,380	5,910	4,980	4,320	4,700	4,580	10,700	7,460	673	65.5	162	435	1,050
Pyrene	141	996	1,910	1,780	1,650	1,660	1,650	3,550	2,570	<DL	64.5	154	<DL	467

Notes:

This table only presents the semivolatile organic compounds that were detected in one or more samples.
Sample SBA-07 is a duplicate of SBA-06, and SBA-12 is a duplicate of SBA-11.
All concentrations are in milligrams per kilogram (mg/kg).
<DL = Analyte concentration was less than the detection limit.

TABLE E-4

TOTAL METALS ANALYSIS OF SLUDGE/SEDIMENT SAMPLES

Analyte	SBA-01	SBA-02	SBA-03	SBA-04	SBA-05	SBA-06	SBA-07	SBA-08	SBA-09	SBA-10	SBA-11	SBA-12	SBA-13	SBA-14
Silver	0.48	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.52	<DL	<DL	<DL	<DL	<DL
Arsenic	2.16	2.01	2.18	1.61	1.67	0.400	0.460	1.54	1.64	1.72	2.84	4.72	2.01	1.13
Beryllium	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.800	<DL	<DL	<DL	<DL
Cadmium	0.480	0.800	1.28	0.760	0.600	<DL	<DL	0.720	<DL	2.48	1.80	1.84	1.36	1.36
Chromium	4.76	4.20	7.20	5.80	4.64	<DL	<DL	6.16	4.52	12.4	7.56	6.64	7.24	11.8
Copper	14.4	16.9	40.6	32.5	12.9	3.40	4.12	22.8	11.2	83.1	229	28.4	27.2	264
Mercury	0.027	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.044	<DL	<DL	0.059	<DL
Nickel	3.00	13.1	18.8	14.2	13.8	2.48	2.36	11.8	10.9	16.0	4.94	3.48	4.28	4.56
Lead	7.28	25.1	37.5	29.2	33.6	5.56	5.52	21.6	20.9	44.2	17.2	14.2	26.7	80.1
Antimony	<DL	7.92	6.20	5.12	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
Selenium	0.160	0.400	0.280	0.240	0.080	0.080	0.080	0.280	0.240	0.200	0.080	0.360	0.160	<DL
Thallium	0.256	1.25	0.976	0.828	0.372	<DL	<DL	0.620	0.740	0.188	<DL	<DL	0.172	<DL
Zinc	73.3	68.4	186	209	96.2	15.3	17.7	71.1	68.9	121	250	173	254	411

Notes:

Sample SBA-07 is a duplicate of SBA-06, and SBA-12 is a duplicate of SBA-11.
All concentrations are in milligrams per kilogram (mg/kg).
<DL = Analyte concentration was less than the detection limit.

TABLE E-5

TCLP ANALYSIS OF SLUDGE/SEDIMENT SAMPLES

Analyte	SBA-01	SBA-02	SBA-03	SBA-04	SBA-05	SBA-06	SBA-07	SBA-08	SBA-09	SBA-10	SBA-11	SBA-12	SBA-13	SBA-14
Benzene	0.06	0.14	**1.07**	**0.53**	0.46	0.39	<DL	<DL	**2.25**	<DL	0.34	<DL	<DL	<DL
Carbon tetrachloride	<DL	<DL	<DL	0.06	<DL	<DL	<DL	0.28	<DL	<DL	<DL	<DL	<DL	<DL
Chlorobenzene	<DL	<DL	0.13	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
Chloroform	<DL	<DL	0.06	0.31	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL
1,2-Dichloroethane	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.21	<DL	<DL	<DL	<DL	<DL
1,1-Dichloroethylene	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.08	<DL	<DL	<DL	<DL	<DL
Tetrachloroethylene	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.12	<DL	0.07	<DL	<DL	0.14
Trichloroethylene	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.08	<DL	<DL	<DL	<DL	0.11
Vinyl chloride	<DL	<DL	**0.28**	**0.32**	<DL	<DL	<DL	**0.55**	**0.83**	<DL	<DL	<DL	<DL	<DL
o-Cresol	<DL	<DL	<DL	0.11	0.13	0.10	0.11	0.57	1.12	<DL	<DL	<DL	<DL	<DL
m- and p-Cresol	<DL	<DL	<DL	0.17	0.13	0.21	0.23	0.95	2.86	<DL	<DL	<DL	<DL	<DL
Cresol	<DL	<DL	<DL	0.28	0.26	0.31	0.34	1.52	3.98	<DL	<DL	<DL	<DL	<DL
Barium	0.409	0.882	1.25	1.68	0.230	<DL	<DL	0.107	0.906	2.94	0.858	1.00	1.78	0.346
Lead	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	<DL	0.235

Notes:

Sludge/sediment samples were analyzed for toxicity characteristic leaching procedures (TCLP) volatile organics, semivolatile organics, and metals. This table only includes analytes that were detected in one or more samples.

Sample SBA-07 is a duplicate of SBA-06, and SBA-12 is a duplicate of SBA-11.

All concentrations are in milligrams per liter (mg/L).

<DL = Analyte concentration was less than the detection limit.

(Shaded/bolded) = Concentration was greater than the TCLP regulatory limit (0.5 mg/L for benzene and 0.2 mg/L for vinyl chloride)